TSD File Inventory Index

Date <u>Rounker 17, 2009</u> Initial <u>CM Mercual</u>

Facility Name Big Review 3		Coanto	
Facility Identification Number /LD	062	444 435	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A:2 Part A / Interim Status		1 Correspondence	1
1 Correspondence		2. All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment	1	C.1 Compliance - (Inspection Reports)	
3 Part A Application and Amendments	1/	C.2 Compliance/Enforcement	1
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	1
5 Change Under Interim Status Requests		.2 Import/Export Notifications	<u> </u>
6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	-
1 Correspondence	i	1 RFA Correspondence	+
2 Repons	1/	.2 Background Reports, Supporting Docs and Studies:	+
A.4 Closure/Post Closure	1	3 State Prelim Investigation Memos	
: Correspondence		4 RFA Reports	
2 Closure/Post Closure Plans Certificates etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1. RFI Correspondence	+
1 Correspondence		2 RFI Workplan	+
2 Reports		3. PSI P P	7
B 1 Administrative Record		3 RFI Program Reports and Oversight 4 RFI Draft /Final Report	+

Total - 5

S RELIGAPP	7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence	8 Progress Reports	
7 Lab Data: Soil-Sampling/Grounowater	D.5 Corrective Action/Enforcement	
8 RF+ Progress Repons	1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence	2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations	
3 Corrective Action/Remediation Study	1 Forms/Checklists	
1 CMS Carrespondence	E. Boilers and Industrial Furnaces (BIF)	-
2 Intenm Measures	1 Correspondence	
3 CMS Workplan	.2 Reports	T
4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
5 Stabilization	G.1 Risk Assessment	ľ
.6 CMS Progress Reports	1 Human/Ecological Assessment	+
7 Lab Data, Soil-Sampling/Groundwater	.2 Compliance and Enforcement	$\frac{1}{1}$
.4 Corrective Action Remediation Implementation	.3 Enforcement Confidential	+
1 CMI Correspondence	4 Ecological - Administrative Record	+
2 CMI Workpian	5 Permitting	1
3 CMI Program Reports and Oversight	6 Corrective Action Remediation Study	1
4 СМI Draft/Final Reports	7 Corrective Action/Remediation Implementation	1
5 CMI QAPP	8 Endangered Species Act	
6 CMI Carrespondence	9 Environmental Justice	4

Note Transmittal Letter to Se Included with Reports Comments



ContingencyPlan rev aug 4 2009 Mike Altepeter to: Todd Brown

08/04/2009 03:01 PM

From:

"Mike Altepeter" <maltepeter@bigriverzinc.com>

To:

Todd Brown/R5/USEPA/US@EPA

Todd, I have incorporated the changes. Please see page 6,7. It takes longer to try and send just the pages so I am sending the whole dolument. Mike

e≢ .

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION SAUGET, ILLINOIS

Revised August 4, 2009

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1.0

INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

2.0

DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric-induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container, which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0. EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The primary or the alternate Emergency Coordinators will decide which portions of this ERP are to be implemented following an evaluation of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC will determine if the emergency presents an actual or possible threat to human health and the environment, or if Big River Zinc personnel can control the situation.

Some types of emergencies that require full implementation of the ERP include:

- A fire that could spread off site;
- A fire that is too large to extinguish with a portable fire extinguisher;
- · A spill or release of hazardous material that results in airborne constituents; and
- · Uncontainable runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

Personnel

Upon discovering a situation that may represent an emergency, plant personnel will:

- Report the situation to a supervisor immediately or call security if the supervisor cannot be found immediately; and
- b. Verbally warn other personnel if the situation is an immediate threat to their safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator or alternate.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:
 - Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion that could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.
 - Notify security to call for police and/or fire department. The police or fire departments have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.
- Commit and direct activities of any and all resources available that are necessary to carry out the ERP.
 The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures, which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security

Ext. 110 (Internal Plant Phone)

(618) 274-5000 ext. 110 (Outside Phone)

Plant Radio

Primary Emergency Coordinator

Mike Altepeter

(618) 274-5000 Ext.194 (office)

(314) 846-8093 (Home) (618) 410-8021 (cell)

Home Address

2936 Point Drive

St. Louis, MO 63129

Alternate Emergency Coordinator

Anthony Thomas

(618) 274-5000 Ext. 198 (office)

(618) 410-8020 (cell)

Second Alternate Emergency Coordinator

Tom Gallagher

(618) 274 5000 ext 262 (office)

(618) 444 5274 (cell)

Home Address

73 Edgewood drive

Sullivan, MO 63080

Federal

National Response Center

(800) 424-8802

(Release of Hazardous Substances)

USEPA Region V

(312) 353-2000

State

Illinois Emergency Management Agency

(800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance

911

Local Emergency Planning Committee (LEPC)

(618) 277-3012

Mr. Don Feher

Local Emergency Planning Committee

321 W. 'F' Street

Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency

(618) 257-5840

Attn. Mr. Don Schneider 4500 Memorial Drive Belleville, IL 62226

Contractor Support

Heritage Environmental

(800) 388-3500

Attn: Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137

Onyx Industrial Services

(618) 931 0010

Fred Davidson

121 East Chain of Rocks Road

Mitchell, IL 62040

Bellon Environmental Company

(314) 890 8600

Bob Goodman 600 Fairview

St. Louis, MO 63132

A copy of the plan and updates to the plan will be sent to the Sauget Fire and Police Departments, the LEPC, Memorial Hospital and the contractors mentioned by registered mail return receipt requested. The return receipts will be filed. A representative of each will be contacted by telephone and the outcome of the conversions recorded and kept on file.

The discussions with the emergency departments will include:

- 1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes;
- 2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department and agreements with any others to provide support to the primary emergency authority;
- 3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

- 4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.
- b) Where State or local authorities decline to enter into such arrangements, the Big River Zinc will document the refusal in the Contingency plan emergency contacts record.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated. The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.
- Upon receiving available information, the EC or security will call the fire department to inform them of
 the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process
 and/or operations that may interfere with the emergency response actions;
- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- Notify all unauthorized personnel to vacate the area per evacuation plans; and
- Follow any instruction given by the fire department.

In addition, the EC must also:

- . Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by observation and review of facility records, manifests, and, if necessary, by chemical analysis; and
- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center (800-424-8802) and the Illinois Emergency Management Agency (800-782-7860). This verbal report includes:

- $\bullet \quad \text{Name, address, and telephone number of the reporter};\\$
- Name and address of the facility;

- · Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;
- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s)
 (MSDS). Use MSDS information to guide response and determine personal protective equipment
 (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize
 the spilled material;
- Alert local authorities if material may reach outside facility property;
- Rope of f and/or barricade the area to prevent entry of unauthorized personnel;
- · Take measures to contain the spill;
- Direct cleanup so that all hazardous materials are placed in properly labeled containers;
- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT)
 approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0

RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment <u>outside the facility</u>, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012

Contractor Support:

Heritage Environmental (800) 377-2440 Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137

Or

Onyx Industrial Services (618) 931 0010

Fred Davidson

121 East Chain-of-Rocks Road

Mitchell, IL 62040

Bellon Environmental Company Bob Goodman 600 Fairview St. Louis, MO 63132 (314) 890 8600

5.0

POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- · Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;

- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;
- Assessment of any actual or potential hazards to human health or the environment;
- · Procedures followed to reduce and remove released materials;
- · Estimated quantity and disposition of the recovered material that resulted from the incident;
- Corrective measures taken;
- · Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0

EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	Description	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gatehouse. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios that are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic. Two-way radio communications with the police and fire departments of Sauget is available to security. A weather monitor is available 24-hours per day in case of a weather emergency.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Cell Phones	There are 19 Cell Phones issued to Key company management personnel. These can be used to contact people needed while outside or inside the plant. The cell phones can be used as normal phone or "walkie talkie" mode.	The cell phones are in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the Security Office for needed information by using the telephone communications. However, emergency communications would generally be handled through the two-way radios and Cell Phones for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The department supervisors inspect the extinguishers on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis. Fire extinguisher training is held annually for all employees. No employees are trained when hired.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy-duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the storeroom.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

7.0 Training

Copies of all training documents will be kept in the Environmental manager's files and in Safety dept files, and on the Server. Please refer to the RCRA training document for a detailed description on training. As a minimum the program will document:

- a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
- b. A written job description for each position described above.
- c. A written description of the type and amount (RCRA Training Document) of both introductory and continuing training that will be given to each person described above.
- d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

APPENDIXA

FACILITY SITE DIAGRAMS

APPENDIX B

EQUIPMENT TABLES Table 1 Location and Content of Fire Equipment Boxes Big River Zinc Corporation Sauget, Illinois

Box Number	Location
A	South of main Casting Dept East of the South Contracting Gate
В	South of the Vehicle Shop along the West fence line
C	East of Cell room along East fence line
D	East of Leach/Purification along East fence line
E	East of the Specialty Casting Building - West of Cell room Unit #3
F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION	USE/CAPABILITIES
One	1 1/2 in. Nozzle	Brass nozzle, Combination,	Enable user to adjust stream
		Adjusts to fog or straight	of water for the need at the
		stream	time of a fire.
One	Reducer	Threaded reducer	To connect hydrant outlet to
		2.5" by 1.5"	the smaller fire hose
Two	Universal Spanner	Cast aluminum 'C' shaped	Use to tighten reducer to
	Wrenches	wrench.	hydrant and to connect fire
			hoses.
One	Hydrant Wrench	Adjustable combination	Used to open the hydrant by
		hydrant and spanner wrench	turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in.	Use to make hose capable of
		industrial strength fire hose	reaching a fire.
One	Axe	Wood handle fireman axe	Use to break open items so
	,		water can reach fire.

Table 2
Spill Response Kit Locations and Contents
Big River Zinc Corporation
Sauget, Illinois

Spill Kit #	Name of SPCC Area	Location Description	Contents Code
1	Drum Storage Area # 2	Roaster Mechanics area outside the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	# 4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	<u>1</u>
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cell room unit # 3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cell room	. 1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cell room	1
13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1 .
14	Hazardous waste storage	Satellite stations for oil dry in vehicle shop and oil shed. Satellite station for parts washer in Vehicle shop	2

Contents Code 1	Contents	Use/capabilities
	6 ea. 3' x 10'	Used to contain
	adsorbent socks	hazardous flowing
		material absorb it
		and preventing the
		contaminant from
		reaching sewer or
		groundwater.
	4 ea. Adsorbent	Used to directly
	Pillows	absorb flowing
		contaminant
	75 ea. Absorbent	Used to directly
	mats	absorb flowing
		contaminant and wipe
		down equipment
	10 ea. bags and ties	Used to contain used
		socks pillows, mats,
		and other
		contaminated
		material and
		transfer to Waste
		containers.

Contents Code 2	Contents	Use/capabilities
	Shovel	Pick up spilled solid
		waste and return to
		container
	Push Broom	Push waste into pile for
		removal with shovel
	Fire extinguisher	Extinguish fire
	Absorbent material	To place on dusty waste
		to keep it from becoming
		airborne and facilitate
		returning to container



RE: Contingency plan for Big River Zinc Mike Altepeter to: Todd Brown

08/04/2009 02:26 PM

From:

"Mike Altepeter" <maltepeter@bigriverzinc.com>

To: Todd Brown/R5/USEPA/US@EPA

Todd

The contingency plan was revised on 13 May of this year because one of the alternate emergency coordinators accepted another position (in Yemen). The name

and address of the new alternate was put into the plan. The revised plan I last

sent you was mailed to the Police, Fire Dept, LEPC and the Hospital by registered mail and I called the Sauget Fire department, Police department and Memorial Hospital. The Fire and Police were had no problems with the plan but the Hospital never returned my messages. The changes concerning contacting these

agencies are in the revised plan on page 6 under the emergency contacts. It is highlighted in grey. If the change is ok, I will send copies of the revision to

all and contact by phone. All this will be kept on file.

In 2009 we have not disposed of any hazardous waste. We only have the satellite

drums for collection of used oil dry and a drum for parts washing. Two drums have not been used and the other two have very little in them because we have little activity at the plant. Mike

----Original Message----

From: Brown.Todd@epamail.epa.gov [mailto:Brown.Todd@epamail.epa.gov]

Sent: Tuesday, August 04, 2009 1:02 PM

To: Mike Altepeter

Subject: Re: Contingency plan for Big River Zinc

Dear Mr. Altepeter:

My apologies for taking several days to reply. I have been out of the office.

Below is the issue with Big River Zinc's current contingency plan that I believe still requires correction. If this can be corrected prior to EPA filing the Consent Agreement and Final Order, EPA can remove this issue from the Order. However, we would like it to be corrected in the next couple of days if possible, as we need to file this Order shortly. Alternatively, we can agree to leave this requirement in the Order, and you can fix it after the Order is filed, in accordance with the schedule of the Order (i believe the draft Order currently requires this to be corrected with 2 weeks or so of the filing of the order).

Current Contingency Plan Issue

35 IAC 722.134(a)(4) and 725.137 requires that hazardous waste generators attempt to make arrangements with certain emergency response organizations (e.g., police, fire department, hospitals, etc.), as appropriate for the type of waste handled at the facility and the potential need for the services of those organizations. If these emergency response organizations decline to enter into the arrangements,

then the generator must document the refusal. 35 IAC 725.152(c) r equires that these arrangements be described in your contingency plan.

I have pasted the required arrangements, as spelled out in the regulations, below for your convenience. I do not see where these arrangements are currently described in your contingency plan. If you believe they are, please call me and help me understand what I am missing. I would be happy to discuss. Otherwise, EPA simply needs Big River Zinc to include a description of the arraignments that have been made in its contingency plan (or make the arrangements if they have not already been made).

If you make the corrections, please forward the corrected plan, or pages of the plan, to me via e-mail or fax. My fax is 312-692-2573.

Thank you in advance for your cooperation in this matter.

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

Section 725.137 Arrangements with Local Authorities

- a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of the following organizations:
- 1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes;
- 2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department and agreements with any others to provide support to the primary emergency authority;
- 3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
- 4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.
- b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

"Mike Altepeter" <maltepeter@bigr

iverzinc.com>

07/30/2009 02:05 PM

Todd Brown/R5/USEPA/US@EPA

To

CC

Subject Contingency plan for Big River Zinc

Todd, I tried to call today about the problems you have with our revised contingency plan. Our attorney called me yesterday and told me there were some problems with the Emergency contact, Police, Fire, Hospital, etc. I would like to fix the problems and make sure we are doing everything correctly. mike

Michael Altepeter
Senior Process Engineer/Environmental Manager
Big River Zinc
maltepeter@bigriverzinc.com
618 274 5000 x 194

	V.	
,		

RCRA CONTINGENCY PLAN AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION SAUGET, ILLINOIS

Revised August 4, 2009

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1.0

INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

2.0 DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric-induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container, which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0.

EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The primary or the alternate Emergency Coordinators will decide which portions of this ERP are to be implemented following an evaluation of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC will determine if the emergency presents an actual or possible threat to human health and the environment, or if Big River Zinc personnel can control the situation.

Some types of emergencies that require full implementation of the ERP include:

- A fire that could spread off site;
- · A fire that is too large to extinguish with a portable fire extinguisher;
- · A spill or release of hazardous material that results in airborne constituents; and
- · Uncontainable runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

Personnel

Upon discovering a situation that may represent an emergency, plant personnel will:

- a. Report the situation to a supervisor immediately or call security if the supervisor cannot be found immediately; and
- b. Verbally warn other personnel if the situation is an immediate threat to their safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator or alternate.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:
 - Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion that could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.
 - Notify security to call for police and/or fire department. The police or fire departments have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.
- Commit and direct activities of any and all resources available that are necessary to carry out the ERP.
 The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures, which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security '

Ext. 110 (Internal Plant Phone)

(618) 274-5000 ext. 110 (Outside Phone)

Plant Radio

Primary Emergency Coordinator

Mike Altepeter

(618) 274-5000 Ext.194 (office)

(314) 846-8093 (Home) (618) 410-8021 (cell)

Home Address

2936 Point Drive

St. Louis, MO 63129

Alternate Emergency Coordinator

Anthony Thomas

(618) 274-5000 Ext. 198 (office)

(618) 410-8020 (cell)

Second Alternate Emergency Coordinator

Tom Gallagher

(618) 274 5000 ext 262 (office)

(618) 444 5274 (œll)

Home Address

73 Edgewood drive Sullivan, MO 63080

Federal

National Response Center

(800) 424-8802

(Release of Hazardous Substances)

USEPA Region V

(312) 353-2000

State

Illinois Emergency Management Agency

(800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance

911

Local Emergency Planning Committee (LEPC)

(618) 277-3012

Mr. Don Feher

Local Emergency Planning Committee

321 W. "F" Street

Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency

(618) 257-5840

Attn. Mr. Don Schneider 4500 Memorial Drive Belleville, IL 62226

Contractor Support

Heritage Environmental

(800) 388-3500

Attn: Mr. Dan Hans 1188 Pershall Road

Bellfountaine, MO 63137

Onyx Industrial Services

(618) 931 0010

Fred Davidson

121 East Chain of Rocks Road

Mitchell, IL 62040

Bellon Environmental Company

(314) 890 8600

Bob Goodman 600 Fairview

St. Louis, MO 63132

A copy of the plan and updates to the plan will be sent to the Sauget Fire and Police Departments, the LEPC, Memorial Hospital and the contractors mentioned by registered mail return receipt requested. The return receipts will be filed. A representative of each will be contacted by telephone and the outcome of the conversions recorded and kept on file.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated.

The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.
- Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

• Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process and/or operations that may interfere with the emergency response actions;

- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- Notify all unauthorized personnel to vacate the area per evacuation plans; and
- Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by
 observation and review of facility records, manifests, and, if necessary, by chemical analysis; and
- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center (800-424-8802) and the Illinois Emergency Management Agency (800-782-7860). This verbal report includes:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;
- Time and type of incident;
- · Name and reportable quantity of material involved to the extent known;
- · Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

 Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;

- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s)
 (MSDS). Use MSDS information to guide response and determine personal protective equipment
 (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize the spilled material;
- Alert local authorities if material may reach outside facility property;
- Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- · Take measures to contain the spill;
- Direct cleanup so that all hazardous materials are placed in properly labeled containers;
- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0

RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment <u>outside</u> the facility, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
·	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012

Contractor Support:

Heritage Environmental (800) 377-2440 Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137

Or

Onyx Industrial Services (618) 931 0010 Fred Davidson

121 East Chain-of-Rocks Road

Mitchell, IL 62040

Bellon Environmental Company Bob Goodman 600 Fairview St. Louis, MO 63132 (314) 890 8600

5.0

POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- Waste management;
- Post-emergency reporting, and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;

- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;
- Assessment of any actual or potential hazards to human health or the environment;
- · Procedures followed to reduce and remove released materials;
- · Estimated quantity and disposition of the recovered material that resulted from the incident;
- Corrective measures taken;
- Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0

EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

<u>Type</u>	- <u>Description</u>	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gatehouse. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios that are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
	Two-way radio communications with the police and fire departments of Sauget is available to security.	
	A weather monitor is available 24-hours per day in case of a weather emergency.	
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Cell Phones	There are 19 Cell Phones issued to Key company management personnel. These can be used to contact people needed while outside or inside the plant. The cell phones can be used as normal phone or "walkie talkie" mode.	The cell phones are in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the Security Office for needed information by using the telephone communications. However, emergency communications would generally be handled through the two-way radios and Cell Phones for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The department supervisors inspect the extinguishers on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis. Fire extinguisher training is held annually for all employees. No employees are trained when hired.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy-duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the storeroom.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

7.0 Training

Copies of all training documents will be kept in the Environmental manager's files and in Safety dept files, and on the Server. Please refer to the RCRA training document for a detailed description on training. As a minimum the program will document:

- a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
- b. A written job description for each position described above.
- c. A written description of the type and amount (RCRA Training Document) of both introductory and continuing training that will be given to each person described above.
- d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

APPENDIX A

FACILITY SITE DIAGRAMS

APPENDIX B

EQUIPMENT TABLES

Table 1 Location and Content of Fire Equipment Boxes Big River Zinc Corporation Sauget, Illinois

Box Number	Location
A	South of main Casting Dept East of the South Contracting Gate
В	South of the Vehicle Shop along the West fence line
C	East of Cell room along East fence line
D	East of Leach/Purification along East fence line
E	East of the Specialty Casting Building - West of Cell room Unit #3
. F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION	USE/CAPABILITIES
One	1 1/2 in. Nozzle	Brass nozzle, Combination, Adjusts to fog or straight stream	Enable user to adjust stream of water for the need at the time of a fire.
One	Reducer	Threaded reducer 2.5" by 1.5"	To connect hydrant outlet to the smaller fire hose
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench.	Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench	Used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose	Use to make hose capable of reaching a fire.
One	Axe	Wood handle fireman axe	Use to break open items so water can reach fire.

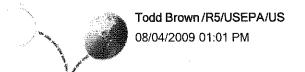
Table 2 Spill Response Kit Locations and Contents Big River Zinc Corporation Sauget, Illinois

Spill Kit #	Name of SPCC Area	Location Description	Contents Code
1	Drum Storage Area # 2	Roaster Mechanics area outside the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	#4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	1.
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cell room unit #3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cell room	1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cell room	1
. 13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1
14	Hazardous waste storage	Satellite stations for oil dry in vehicle shop and oil shed. Satellite station for parts washer in Vehicle shop	2

B-8

Contents Code 1	Contents	Use/capabilities
	6 ea. 3' x 10'	Used to contain
	adsorbent socks	hazardous flowing
		material absorb it
		and preventing the
		contaminant from
		reaching sewer or
		groundwater.
	4 ea. Adsorbent	Used to directly
	Pillows	absorb flowing
		contaminant
	75 ea. Absorbent	Used to directly
	mats	absorb flowing
		contaminant and wipe
		down equipment
	10 ea. bags and ties	Used to contain used
•		socks pillows, mats,
		and other
		contaminated
		material and
		transfer to Waste
		containers.

Contents Code 2	Contents	Use/capabilities
	Shovel	Pick up spilled solid
		waste and return to
		container
	Push Broom	Push waste into pile for
		removal with shovel
	Fire extinguisher	Extinguish fire
	Absorbent material	To place on dusty waste
		to keep it from becoming
		airborne and facilitate
		returning to container



To "Mike Altepeter" <maltepeter@bigriverzinc.com>

CC

bcc Karen Peaceman/R5/USEPA/US@EPA

Subject Re: Contingency plan for Big River Zinc

Dear Mr. Altepeter:

My apologies for taking several days to reply. I have been out of the office.

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Current Contingency Plan Issue

35 IAC 722.134(a)(4) and 725.137 requires that hazardous waste generators attempt to make arrangements with certain emergency response organizations (e.g., police, fire department, hospitals, etc.), as appropriate for the type of waste handled at the facility and the potential need for the services of those organizations. If these emergency response organizations decline to enter into the arrangements, then the generator must document the refusal. 35 IAC 725.152(c) requires that these arrangements be described in your contingency plan.

I have pasted the required arrangements, as spelled out in the regulations, below for your convenience. I do not see where these arrangements are currently described in your contingency plan. If you believe they are, please call me and help me understand what I am missing. I would be happy to discuss. Otherwise, EPA simply needs Big River Zinc to include a description of the arraignments that have been made in its contingency plan (or make the arrangements if they have not already been made).

If you make the corrections, please forward the corrected plan, or pages of the plan, to me via e-mail or fax. My fax is 312-692-2573.

Thank you in advance for your cooperation in this matter.

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

Section 725.137 Arrangements with Local Authorities

- a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of the following organizations:
- 1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes;

- 2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department and agreements with any others to provide support to the primary emergency authority;
- 3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
- 4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.
- b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

"Mike Altepeter" < maltepeter@bigriverzinc.com>



"Mike Altepeter "
<maltenate (maltepeter @bigriverzinc .co m>

07/30/2009 02:05 PM

To Todd Brown/R5/USEPA/US@EPA

CC

Subject Contingency plan for Big River Zinc

Todd,

I tried to call today about the problems you have with our revised contingency plan. Our attorney called me yesterday and told me there were some problems with the Emergency contact, Police, Fire, Hospital, etc. I would like to fix the problems and make sure we are doing everything correctly.

Michael Altepeter Senior Process Engineer/Environmental Manager Big River Zinc maltepeter@bigriverzinc.com 618 274 5000 x 194



"Mike Altepeter " <maltepeter @bigriverzinc .co m>

07/30/2009 02:05 PM

To Todd Brown/R5/USEPA/US@EPA

CC

bcc

Subject Contingency plan for Big River Zinc

History:

This message has been replied to.

Todd.

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Michael Altepeter Senior Process Engineer/Environmental Manager Big River Zinc maltepeter@bigriverzinc.com 618 274 5000 x 194



To Todd Brown/R5/USEPA/US@EPA

CC

bcc

Subject Request for Information

Todd,

Our Attorney just sent me an e mail saying that you had not received our reply. She asked I fax a copy. I saved a scanned copy so I have attached it to this e mail.

I sent it registered mail and tracked it to the East St Louis Post Office. I have no clue as to why it is there. We just sent someone there yesterday to pick up a registered letter and it was the request you sent me that we never received.

I am sorry I thought you had this all the time.

I will print and mail another copy that is more legible that the scanned one attached to this e mail.

Mike

Michael Altepeter Senior Process Engineer/Environmental Manager Big River Zinc maltepeter@bigriverzinc.com 618 274 5000 x 194



Entire reply to region V on pdf Jan 2008.pdf



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

FEB 0 3 2009

REPLY TO THE ATTENTION OF: LR-8J

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Gary King
Acting Chief
Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: Big River Zinc Corporation EPA I.D. No.: ILD062444435

Dear Mr. King:

Pursuant to Section 3008(a)(2) of the Resource Conservation and Recovery Act, as amended, I am providing notice to you that the U.S. Environmental Protection Agency is preparing to issue an Order under Section 3008(a)(1) to Big River Zinc Corporation. The Order is in response to the September 19, 2007, inspection by EPA and addresses violations of the Standards Applicable to Generators of Hazardous Waste.

If you have any questions regarding this letter, please contact Todd Brown of my staff at (312) 886-6091.

Sincerely,

Willie H. Harris, P.E.

Chief, RCRA Branch

Land and Chemicals Division

cc: Todd Marvel, Illinois EPA

A. Received by (Riegan Bript Gleation Agenate of Delivery 1021 North Grand Avenue Bast Cost Office Box 19276 ☐ Addressee ☐ Agent % & _ _ _ D. Is delivery address different from item 1? If YES, enter delivery address below: and Hown Service Type

Certified Mail Attach this card to the back of the mailpiece, երևավվեսվեկակարկականվեր Print your name and address on the reverse Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. SENDER: COMPLETE THIS SECTION so that we can return the card to you. or on the front if space permits. 1. Article Addressed to:

Gary King

COMPLETE THIS SECTION ON DELIVERY

Laboration of the control of the con 102595-01-M-1424 □ Yes 3813 4. Restricted Delivery? (Extra Fee) □ C.O.D. ☐ Registered ☐ Insured Mail 0320 0005 Domestic Return Receipt The second secon 7007 IEPA 1021 North Grand Avenue East Springfield, IL 62794-9276 PS Form 3811, March 2001 (Transfer from service label) Bureau of Land 2. Article Number

Branch File bcc: Official File Author ORC

CONTROL OF THE PROPERTY OF THE

Land and Chemicals Division

[☐ Notice of Violation and In☐ No Violation Letter and In☐ Letter of Acknowledgmer☐ Information Request☐ Pre-Filing and Opportunit☐ State Notification of Enfo☐ Return to Compliance☐ SNC Memo	nspection Report/Cont ty to Confer		
Facility Name: Big Ri	ver Zinc Corporation			
Facility Location: 24	01 Mississippi Avenue.			· villeurori-Markh
City: Sauget		State: <u>Illi</u>	nois	·
U.S. EPA ID#: ILD06	2444435			
Assigned Staff: Todd	Brown	Phone: <u>3</u>	12-886-6091	
Name	Signature		Date	
Author	Joll Bro	reem	1/27/09	
Regional Counsel	Karon flear	Cenar	1/27/09	
Section Chief	Jame M.	Jen ~	1/27/09	
Branch Chief	Willie A. D.	Vana	1/29/09	\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \
Division Director				

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

- 1. Date stamp the cover letter;
- 2. Make four copies of the contents of this folder:

One copy for the assigned staff;

One copy for the section file;

One copy for the branch file; and

One copy for the official file.

- 3. Make any additional copies for cc's or bcc's.
- 4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

- 5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
- 6. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JAN 0 7 2009

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

George Obeldobel President Big River Zinc Corporation 2401 Mississippi Avenue Sauget, Illinois 62201

Re: Request for Information EPA ID No.: ILD062444435

Dear Mr. Obeldobel:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Big River Zinc Corporation ("BRZ" or "you") to submit certain information relating to the storage of hazardous waste at its facility located at 2401 Mississippi Avenue in Sauget, Illinois. We are requiring this information to determine BRZ's compliance status with the Standards Applicable to Generators of Hazardous Waste and the Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities set forth at Title 35 of the Illinois Administrative Code (35 IAC), Parts 722 and 724, respectively. The enclosure specifies the information you must submit. You must submit this information within 14 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Todd C. Brown, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

BRZ must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should

the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 <u>et seq.</u>, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject BRZ to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,

Lorna M. Jereza
Chief, Compliance Section 1

RCRA Branch

Land and Chemicals Division

Enclosure

ce: Todd Marvel, Illinois Environmental Protection Agency (w/ enclosure)
Julie O'Keefe, Armstrong Teasdale LLP (w/ enclosure)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

- 1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each individual identified, business telephone number for each individual identified, and the number of years that each individual has worked for BRZ.
- Please provide true and accurate copies of all records that report the results of the analyses conducted on samples taken from the demolition of the Leach Building, including the analytical results obtained from any samples taken from demolished concrete, wood and brick.
- 3. Please describe the condition of the Concrete Concentrate Storage Pad located on the northeast corner of the plant, which was used by BRZ to store hazardous waste debris generated from its demolition activities. In particular:
 - a. identify any cracks or gaps in the floor of the concrete pad;
 - b. describe any coatings or sealants existing on the surface of the concrete pad;
 - c. describe the walls or barriers around the concrete pad;
 - d. provide information regarding any inspections or maintenance of the concrete pad by BRZ in the last ten years; and
 - e. describe in detail how runoff from the concrete pad is managed.
- 4. State whether the pile of contaminated wood located immediately to the west of the Concentrate Storage Building and observed by the U.S. EPA inspector during the September 19, 2007 EPA inspection (featured in photograph 11 of the corresponding inspection report) was also located on the Concrete Concentrate Storage Pad.
- 5. If the answer to 4, above, is negative, describe the condition of the surface upon which the pile of contaminated wood was located. In particular:
 - a. identify if there was any concrete or other surface separating the pile from the underlying soil;
 - b. if the answer to 5a, above, is affirmative, identify any cracks or gaps in the concrete or surface material;
 - c. if the answer to 5a, above, is affirmative, describe any coatings or sealants existing on the concrete or surface material;

- d. if the answer to 5a, above, is affirmative, provide information regarding any inspections or maintenance of the concrete or surface conducted by BRZ in the last ten years; and
- e. describe in detail how runoff from the area is managed.
- 6. Please provide a copy of Big River Zinc's Hazardous Waste Contingency Plan as it existed on September 19, 2007.
- 7. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. 	A. Received by (Please Print Clearly) B. Date of Deliver 10c HE 172 H and C. Signature
 Attach this card to the back of the mailpiece, or on the front if space permits. 	X Agent NAddresse
1. Article Addressed to:	U. Is delivery address different from item 1?
George Obeldobel	
President Big River Zinc Corporation 2401 Mississippi Avenue Sauget, IL 62201	Service Type Certified Mail
	4. Restricted Delivery? (Extra Fee)
2. Article Number 7001 0320 (Transfer from service label)	7001 0320 0005 B922 S022
PS Form 3811, March 2001 Domestic Return Receipt	turn Receipt 102595-01-M-14

ON TED STAIRS TO NOT THE WARRENT OF THE WARRENT OF

Land and Chemicals Division

Type of Document:	□ Notice of Violation and Insp □ No Violation Letter and Insp □ Letter of Acknowledgment □ Information Request □ Pre-Filing and Opportunity t □ State Notification of Enforce □ Return to Compliance	to Confer
Facility Name: Big l	River Zinc Corporation	
Facility Location: 2	401 Mississippi Avenue	a (
City: Sauget	· · · · · · · · · · · · · · · · · · ·	State: Illinois
U.S. EPA ID#: ILDO	062444435	
Assigned Staff: Tod	d Brown	Phone: 312-886-6091
Name	Signature	Date
Author	hodel weer	n 115189
Regional Counsel	Karon fleo	10m 116001
Section Chief	M. A	ene 1/1/2 (28

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;

Branch Chief

2. Make four copies of the contents of this folder:

One copy for the assigned staff;

One copy for the section file;

One copy for the branch file; and

One copy for the official file.

- 3. Make any additional copies for cc's or bcc's.
- 4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

- 5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
- 6. E-mail staff the date that the letter was received by facility.



"Mike Altepeter" <maltepeter@bigriverzinc.co m>

Τo

01/26/2009 01:19 PM

Subject Request for Infomation

History:

This message has been forwarded.

Todd,

First, I am writing an e-mail because the phones here are dead. Apparently the power supply is gone until tomorrow sometime.

Next, I have only some of the answers because of a mix up somewhere. Our attorney said that the request was coming and we should look for it. I asked our attorney about it last week and she had received it but we had not. She forwarded it to us last Thursday in an e mail.

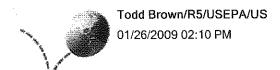
I have most of the information, but I cannot inspect the ore pad for cracks because half the pad is covered with ice and it is entirely covered with snow. (My buggy actually broke through the ice at one point and I had to get rescued by one of our large earth movers.) It is supposed to remain cold here for the rest of the week anyway.

At this point, what should I do?

Thanks

Mike

Michael Altepeter Senior Process Engineer/Environmental Manager Big River Zinc maltepeter@bigriverzinc.com 618 274 5000 x 194



To "Mike Altepeter" <maltepeter@bigriverzinc.com>

CC

bcc Karen Peaceman/R5/USEPA/US@EPA

Subject Re: Request for Information

Dear Mr. Altepeter:

Sorry to hear of your difficulties with power and ice down in Sauget

I do not know why you did not receive a copy of the Information Request. Our records show that it was mailed to Mr. Obeldobel on January 7, and Ms. O'Keefe was copied as a courtesy. All I can guess is that the letter is lost or delayed in the mail for some reason.

As for answering the Information Request. I am assuming from your e-mail that Big River Zinc is only unable to provide answers to portions of questions 3 and 5 due to the current whether conditions. We would request then that Big River Zinc submit responses at this time to those questions in the Information Request that Big River Zinc is capable of answering at this time. For those questions that cannot be answered at this time, please provide a brief written explanation for the record.

If you have any questions please feel free to contact me by phone (when working again) or e-mail.

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

Protecting the environment is everyone's responsibility. Help EPA fight pollution by reporting possible harmful environmental activity. To do so, visit EPA's website at http://www.epa.gov/compliance/complaints/index.html
"Mike Altepeter" <maltepeter@bigriverzinc.com>



"Mike Altepeter" <maltepeter@bigriverzinc.co m>

01/26/2009 01:19 PM

To Todd Brown/R5/USEPA/US@EPA

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Mike

Michael Altepeter Senior Process Engineer/Environmental Manager Big River Zinc maltepeter@bigriverzinc.com 618 274 5000 x 194



To Todd Brown/R5/USEPA/US@EPA

cc "Julie O'Keefe" <JOKEEFE@ArmstrongTeasdale.com>,
 "George Obeldobel \(George Obeldobel\)"
 <Gobeldobel@bigriverzinc.com>

hcc

Subject RE: Request for Information

History:

This message has been replied to and forwarded.

Todd,

I am glad you sent the courtesy copy because we still have nothing here at ${\tt BRZ}.$

I shall do as you say. Mike

----Original Message----

From: Brown.Todd@epamail.epa.gov [mailto:Brown.Todd@epamail.epa.gov]

Sent: Monday, January 26, 2009 2:10 PM

To: Mike Altepeter

Subject: Re: Request for Information

Dear Mr. Altepeter:

Sorry to hear of your difficulties with power and ice down in Sauget

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Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov

Protecting the environment is everyone's responsibility. Help EPA fight pollution by reporting possible harmful environmental activity. To do so, visit EPA's website at

"Mike Altepeter" <maltepeter@bigr iverzinc.com>

01/26/2009 01:19 PM Todd Brown/R5/USEPA/US@EPA

To

CC

Subject

Request for Infomation

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Mike

Michael Altepeter Senior Process Engineer/Environmental Manager Big River Zinc maltepeter@bigriverzinc.com 618 274 5000 x 194



PDC Laboratories, Inc.

3278 N. Highway 67 • Florissant, MO 63033 (314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977



Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter

Arsenic, TCLP

Barium, TCLP

Lead, TCLP

Silver, TCLP SW-846 7470A R1.0

Mercury, TCLP

Cadmium, TCLP

Chromium, TCLP

Selenium, TCLP

Date Received: 08/21/07 16:04

Report Date :08/23/07 Customer # :201097 P.O. Number :34339

Facility:

Sample No: 07088355-4		(Collect Date 08/21/07 09	:20
Client ID : LEACH FLOOR	Site: STL		Locator:	<u></u>
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH Leachate Preparation		7.34	08/22/07 12:30 08/22/07 12:30	MEP.FM MEP.FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
S:V-846 6010 TCLP				
Arsenic, TCLP	<	0.03 ma/l	08/23/07 11:39	WPS
Barium, TCLP		0.56 mg/l	08/23/07 11:39	WPS
Cadmium, TCLP	•	0.02 mg/l	08/23/07 11:39	WPS
Chromium, TCLP		0.064 mg/l	08/23/07 11:39	WPS
Lead, TCLP	<	0.02 mg/l	08/23/07 11:39	WPS
Selenium, TCLP		0.038 mg/l	08/23/07 11:39	WPS
Silver, TCLP	•	0.0036 mg/l	08/23/07 11:39	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS
Sample No: 07088355-5	, <u></u>		Collect Date 08/21/07 10):00
Client ID: COPPER RECOVERY	Site: STL		Locator:	
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311			•	
Final pH		6.5	08/22/07 12:30	MEP.FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A			•	
Sample Preparation			08/23/07 08:00	JS

0.03 mg/l

0.75 mg/l

0.11 mg/l

0.004 mg/l

 $0.058\,\mathrm{mg/l}$

0.0041 mg/l

0.0002 mg/l

0.02 mg/l

08/23/07 11:42

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Mercury, TCLP

PDC Laboratories. Inc.

3278 N. Highway 67 • Florissant, MO 63033 (314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977



Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received: 08/21/07 16:04

Report Date: 08/23/07 Customer #: 201097 P.O. Number: 34339

Facility:

ample No: 07088355-6	•		Collect Date 08/21/07 10:30	
Client ID: EIMCO BASEMENT WALL	Site : STL	<u> </u>	Locator:	
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		5.53	08/22/07 12:30	MEP,FM
Leachate Preparation			08/22/07 12:30	MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
W-846 6010 TCLP				
Arsenic, TCLP	<	0.03 mg/l	08/23/07 11:45	WPS
Barium, TCLP		0.42 mg/l	08/23/07 11:45	WPS
Cadmium, TCLP		5.2 mg/l	08/23/07 11:45	WPS
Chromium, TCLP		0.21 mg/l	08/23/07 11:45	WPS
Lead, TCLP	<	0.02 mg/l	08/23/07 11:45	WPS
Selenium, TCLP		0.021 mg/l	08/23/07 11:45	WPS
Silver, TCLP		0.0057 mg/l	08/23/07 11:45	WPS
:W-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS
Sample No: 07088355-7			Collect Date 08/21/07 11:00	
Client ID: 2ND STAGE PRESS FLOR	Site: STL		Locator:	·
Parameter	Qualifier	Result	Analysis Date	Analyst
- For allietel				·
SW-846 1311		6.46	08/22/07 12:30	
		6.46	08/22/07 12:30 08/22/07 12:30	MEP,FM MEP,FM
SW-846 1311 Final pH Leachate Preparation		6.46		MEP,FM
SW-846 1311 Final pH Leachate Preparation SW-846 3010A		6.46		MEP,FM
Final pH Leachate Preparation SW-846 3010A Sample Preparation		6.46	08/22/07 12:30	MEP,FM MEP,FM
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08/23/07 11:20

WPS



PDC Laboratories. Inc.

3278 N. Highway 67 • Florissant, MO 63033 (314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977



Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201

Attn: Mr. Mike Altepeter

Date Received: 08/21/07 16:04

Report Date : 08/23/07

Customer # : 201097 P.O. Number : 34339

Facility:

ACCREDITATIONS

NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100253.

Certified by: Bahara G. Pandolfo, Project Manager

This report shall not be reproduced, except in full, without the written approval of the laboratory.



PDC Laboratories, Inc. - St. Louis 3278 N. Highway 67 (Lindbergh) Florissant, MO 63033

www.environmetrics.net

CHAIN OF CUSTODY RECORD
Phone (314) 432-0550 or (314) 921.

Phone (314) 432-0550 or (314) 921-4488 Fax (314) 432-4977 or (314) 921-4494

State where samples collected ...

(Instructions/Sample Acceptance Policy on Reverse)

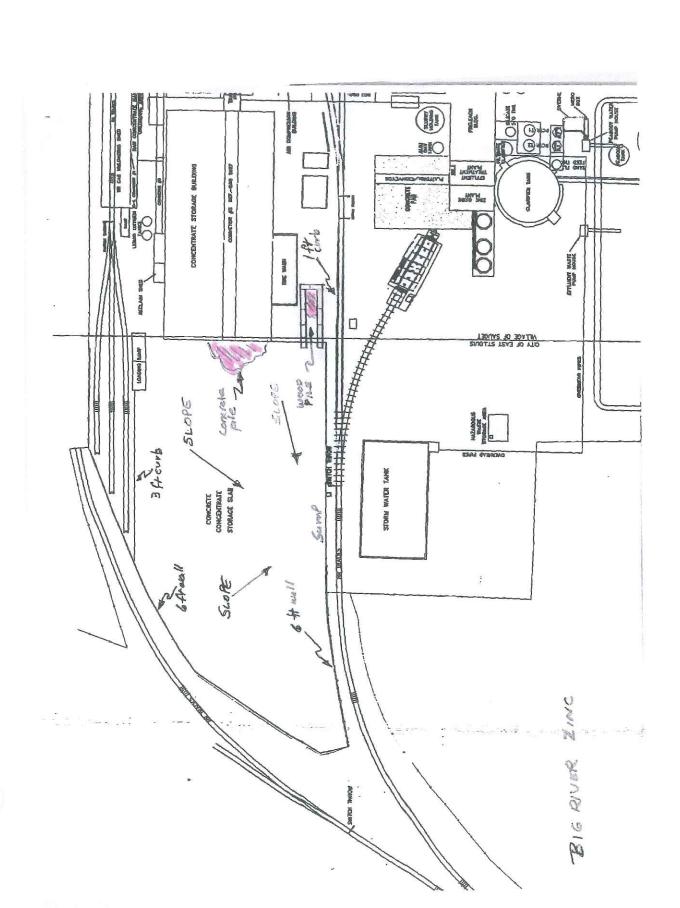
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Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 3

Concentrate Storage Pad



APPLICA ' AND CERTIFICATE FOR PAYMENT	AIA DOCUMENT G702 WO PAGES
TO: Aiver Zinc Corporation	APPLICATION NO: 1 Distribution 1.
2401 Mississippi Avenue	OWNER
Sauget, IL 62201	PERIOD TO: 08/09/02 ENGINEER CONTRACTOR
FROM: BERCO Construction, Inc. 7008 B Godfrey Road Godfrey, IL 62035	
Purchase Order	Order No. 42671 CONTRACT DATE: July 19, 2002
APPLICATION FOR PAYMENT	Application is made for Payment, as shown below, in connection with the Contract
CHANGE ORDER SUMMARY ADDITIONS DEDUCTIONS	Continuation Sheet, AIA Document G703, is attached.
Change Orders approved in	
Approved this Month	
Number Date	A TOTAL COMPLETED & STORED TO DATE
	(Column G on G703)
2 \$283.14	5. RETAINAGE:
3 \$1,108.50	
	(Column D + E on G703)
TOTALS \$41,539.64	b. 0% of Stored Material \$0.00
Net Change by Change Orders	(Colum F on G703)
The undersigned Contractor certifies that to the best of the Contractors	.
knowledge, information and belief the work covered by this Application for Payment has been completed in accordance with the Contract Documents	6 TOTAL FARNED FSS RETAINAGE \$59 105 64
that all amounts have been paid by the Contractor for Work for which	(Line 4 less Line 5 total)
previous Certificates for Payment were issued and payments received from	7. LESS PREVIOUS CERTIFICATES FOR
the Owner, and that current payment shown herein is now due.	Certificate)
	8. CURRENT PAYMENT DUE
CONTRACTOR: BERCO Construction, Inc.	(Line 3 less Line 6)
(Jersey
	sworn to before me on this day 08/28/02
BY: 1/4 Date: 08/28/02	My Commission expires: (2)
Richard E. Schuetz, President	** 0 / TSY
ARCHITECT'S CERTIFICATE FOR PAYMENT	AMOUNT CERTIFIED:
In accordance with the Contract Documents, based on on-site observations	(Attach explanation if amount certified differs from the amount applied for)

In accordance with the Contract Documents, based on on-site observations the work has progressed a indicated. The quality of work is in accordance and the data comprising the above application, the Architect certified to the with the Contract Documents, and the Subcontractor is entitled to payment Owner that to the best of the Architect's knowledge, information and belief of the Amount Certified

Contractor named herein. Issuance, payment and acceptance of payment are without prejudice to any rights of the Owner or Contractor under the Contract.

This Certificate is not negotiable. The Amount Certified is payable only to the

ARCHITECT:

08/28/02 08/28/02

APPLICATION DATE:

PERIOD TO:

APPLICATION NUMBER:

AIA DOCUMENT G703

Concentrate Storage Slab Repair

CONTINUATION SHEET

AIA Document G702, APPLICATION AND CERTIFICATE FOR PAYMENT, containing

Contractor's signed Certification is attached.

In tabulations below amounts are stated to the nearest dollar

Use Column I on Co stracts where variable retainage for line items may apply.

NO

0.00

\$0.00 \$0.00 \$0.00 \$0.00 RETAINAGE \$0.00 \$0.00 \$0.00 \$0.00 BALANCE TO FINISH (C-G) 100,00% 100.00% 100.00% 100.00% 0/9 % (D+E+F) \$17,566.00 (\$1,108.50) STORED TO DATE \$42,365.00 \$283.14 COMPLETED & \$59,105.64 TOTAL NOT IN DORE) \$0.00 \$0.00 \$0.00 \$0.00 MATERIALS PRESENTLY STORED FROM PREVIOUS THIS PERIOD (\$1,108.50) \$42,365.00 \$283.14 \$17,566.00 \$59,105.64 WORK COMPLETED 00:0 \$0.00 **APPLICATION** (D + E) (\$1,108.50) \$283,14 \$42,365.00 \$59,105.64 \$17,566.00 SCHEDULED VALUE DESCRIPTION OF WORK C.O. #3 - Deduct 150 sq ft Repairs Slab Repairs - Demo/Replace C.O. #1 - Additional Repairs C.O. #2 - Explor. Exc. T/M Total

Note: Item No. 4 (C.O. 3) represents a deduct for concrete and reinforcing.

The demolition and backfill activities have been completed.

WAIVER OF LIEN (Valid Upon Receipt of Payment)

STATE OF <u>ILLINOIS</u> COUNTY OF <u>MADISON</u>

TO WHOM IT MAY CONCERN:

The undersigned, for and in consideration of the dollar amount shown below and other goods and valuable consideration, the receipt of which is hereby acknowledged, do(es) hereby waive and release, under the mechanics lien statues of the state where the project premises are located, any and all lien or claim or right of lien on the above described premises and the improvements, fixtures, and appurtenances thereon, and on the monies or other considerations due or to become due from the Owner and on all other project related monies from whatever source, on account of labor, service, materials, fixtures or apparatus furnished by the undersigned for or in connection with the above described premises.

In addition, the undersigned being duly sworn and deposed warrants that: (1) all workers employed by it or its subcontractors on the project have been fully paid to the date of this waiver; (2) all vendors, suppliers or materialmen from whom the undersigned or its subcontractors have purchased materials used in the project have been paid for materials delivered, on or prior to the date of this waiver; (3) none of the aforementioned workers or material suppliers has any claim or demand or right of lien against the above described premises and improvements thereon; and (4) all statements contained herein are true and correct and that he makes this waiver in order to induce payment with full knowledge and intent that the Owner any any lenders or title insurers will rely thereon.

BERCO Construction, Inc. 7008-B Godfrey Road P.O. Box 5134 Godfrey, Illinois 62035 PAYMENT AMOUNT:

\$59,105.64____

Pay Application # 1

Richard E. Schuetz, Presider(t

25

(618) 467-2440

Sold to

BIG RIVER ZINC ROUTE 3 & MONSANTO SAUGET, IL 62201 Ship to

BRZ22102/CONC. CONCEN. SLAB SAUGET, ILLINOIS

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Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 3

Contingency Plan

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION SAUGET, ILLINOIS

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1.0

INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

20

DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0.

EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The decision as to which elements of this ERP are to be implemented is made by the primary or alternate EC following an assessment of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC is responsible for determining if the emergency presents an actual or possible threat to human health and the environment, or if the situation can be controlled by onsite personnel and resources.

Some types of emergencies that require full implementation of the ERP include:

- A fire that could spread off site;
- · A fire that is too large to extinguish with a portable fire extinguisher;
- · A spill or release of hazardous material that results in airborne constituents; and
- Uncontainable impacted runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

Personnel

Upon discovering a situation which may represent an emergency, plant personnel will:

- a. Report the situation to a supervisor immediately or call security; and
- b. Verbally warn other personnel if the situation is an immediate threat to safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:
 - Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion which could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.
 - Notify security to call for police and/or fire department. The police or fire department have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.
- Commit and direct activities of any and all resources available that are necessary to carry out the ERP.
 The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security

Ext. 110 (Internal Plant Phone)

(618) 274-5000 ext. 110 (Outside Phone)

Primary Emergency Coordinator

Mike Altepeter

(618) 274-5000 Ext. 194 (office)

(618)410-8021

 (∞I)

Alternate Emergency Coordinator

Anthony Thomas

(618) 274-5000 Ext. 198 (office)

(618) 410-8020

(cell)

Federal

National Response Center

(800) 424-8802

(Release of Hazardous Substances)

USEPA Region V

(312) 353-2000

State

Illinois Emergency Management Agency

(800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance

911

Local Emergency Planning Committee (LEPC)

(618) 277-3012

Mr. Don Feher

Local Emergency Planning Committee

321 W. "F" Street

Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency

(618) 257-5840

Attn. Mr. Don Schneider 4500 Memorial Drive Belleville, IL 62226

Contractor Support

Heritage Environmental

(800) 388-3500

Attn: Mr. Dan Hans 1188 Pershall Road

Bellfountaine, MO 63137

Big River Zinc has discussed the contents of this plan, and has provided a copy of the plant to the Sauget Fire and Police Departments, the LEPC, Heritage Environmental and Memorial Hospital.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the ECs knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated. The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.
- Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process and/or operations that may interfere with the emergency response actions;
- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- · Notify all unauthorized personnel to vacate the area per evacuation plans; and
- Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by
 observation and review of facility records, manifests, and, if necessary, by chemical analysis; and
- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will
 assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center (800-424-8802) and the Illinois Emergency Management Agency (800-782-7860). This verbal report includes:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;
- · Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;
- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s)
 (MSDS). Use MSDS information to guide response and determine personal protective equipment
 (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize the spilled material;
- Alert local authorities if material may reach outside facility property;
- · Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- · Take measures to contain the spill;
- · Direct cleanup so that all hazardous materials are placed in properly labeled containers;
- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0

RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment <u>outside</u> the facility, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8	802
	USEPA Region V	(312) 353-2000	
State	Illinois Emergency Management Agency	(800) 782-7860	
Local	Sauget Fire, Police, Ambulance	911	
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012	

Contractor Support

Heritage Environmental Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137 (800) 377-2440

5.0 POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/deanup;
- Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;
- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;

- · Assessment of any actual or potential hazards to human health or the environment;
- Procedures followed to reduce and remove released materials;
- · Estimated quantity and disposition of the recovered material that resulted from the incident;
- · Corrective measures taken;
- Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0

EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	<u>Description</u>	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gate house. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios which are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
	Two way radio communications with the police and fire departments of Sauget is available to security.	
	A weather monitor is available 24-hours per day in case of a weather emergency.	
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Paging System	There are 20 in-plant pagers carried by superintendents, general department supervisors, engineers, maintenance supervisors, and other supervisors for communication in the immediate plant area.	The paging system is in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the paging units and the Security Office for needed information by using the pager and telephone communications. However, emergency communications would generally be handled through the two way radios for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The extinguishers are inspected by the department supervisors on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the store room.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

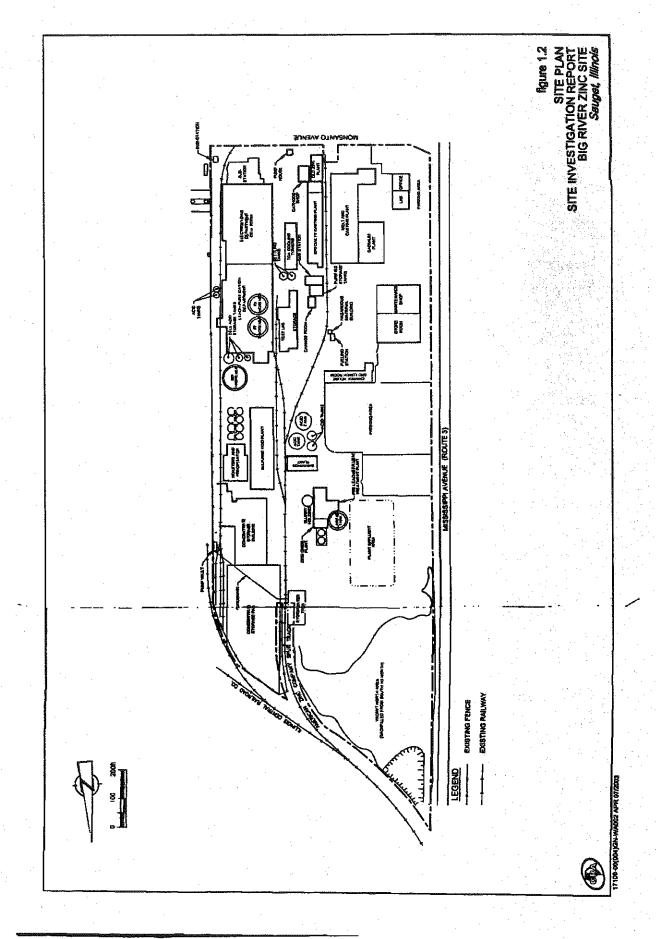
7.0 Training

The details of the training program for personnel involved in contingencies involving hazardous waste will be kept in the training department. As a minimum the program will document:

- a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
- b. A written job description for each position described above.
- c. A written description of the type and amount of both introductory and continuing training that will be given to each person described above.
- d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

APPENDIXA

FACILITY SITE DIAGRAMS



APPENDIX B

EQUIPMENT

TABLES

EQUIPMENT TABLES

Table 2

Location and Content of Fire Equipment Boxes Big River Zinc Corporation Sauget, Illinois

Box Number	Location	
A	South of main Casting Dept East of the South Contra	cting Gate
В	South of the Vehicle Shop along the West fence line	
C	East of Cellroom along East fence line	and the second of the second o
D	East of Leach/Purification along East fence line	
E	East of the Specialty Casting Building - West of Cellroo	m Unit#3
· F	At the Oil House	
G	Northwest of the Acid Plant Converter, by the railroad	tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION/USE
One	1 1/2 in. Nozzle	Combination, Adjusts to fog or straight stream
One	Reducer	To reduce hydrant outlet to the fire hose (2 1/2 in. down to 1 1/2 in.)
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench. Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench to be used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose
One	Axe	Wood handle fireman axe

Table 3
Spill Response Kit Locations and Contents
Big River Zinc Corporation
Sauget, Illinois

Spill Kit	Name of SPCC Area	Location Description	Contents
#		•	Code
	Drum Storage Area # 2	Roaster Mechanics area	1
		inside of building on the	
		south outer wall	
2	#5 Substation-pad mounted	Inside doorway, SE corner	1 .
	transformer	of skimmings plant	
3	Waste Oil # 2	Outside the NW corner of	1
4	TS: 1.0.0	the oil house	
4	Diesel & Gasoline	Above ground tanks, located	1 .
	dispensing area	west of RR tracks and S of	
5	Waste Oil # 1	cafeteria Outside of building at the	1
υ	waste On#1	SW corner of the vehicle	1
		shop	•
6	Substation # 13A & 13B Pad	Substation located N of	1
	mounted transformer	special casting & S of the	. *
		purified storage tanks	
7	# 4 Substation transformer	Inside E wall of the special	1
		casting bldg. N of the T-	
		metal furnace	
8	Substation # 6, 6A & 6B,	S end of the main casting	1
	Pad mounted transformer	bldg. Inside the fenced area	100
		of the transformer yard	
9	Substation # 11, Pad	S of cellroom unit #3	1
	mounted transformer		
10	Satellite Kerosene storage	Outside SE corner of the	1
* 1	tank (winter only)	Quonset storage	
11	Substation # 1, Pad	Fenced transformer area,	1
12	mounted transformer	south end of cellroom	-
LZ	Substation # 2, Pad mounted transformer	SE corner of fenced	1
	mounted transformer	transformer yard, S end of cellroom	
13	Substation # 9, Pad	E side of ground level L/P,	1
	mounted transformer	south of residue loading	
14	Hazardous waste storage	N of pre-leach bldg. W of	2
		sludge pad	

Contents Code:

1

9

6 ea. 3" X 10' socks

2 ea. Long Handle Shovels

4 ea. Absorbent pillows 75 ea. Absorbent mats 2 ea. Push brooms 1 ea. 20 lb. CO Fire

extinguisher

10 ea. Disposable Bags/ties

1 ea. 15 lb. CO Fire

extinguisher

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DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
Admin Bldg	SE Entry			3ZHFC	3ZHFD	20 Ib ABC DRY CHEM
Admin Bldg	O/S Accounting			3ZHFR	3ZHFS	20 lb ABC DRY CHEM Cart-Op
Admin bldg	Sample Room			3ZHG0	3ZHG1	20 lb BC DRY CHEM Cart-OP
Admin Bldg	Lobby			3ZHFF	3ZHFG	5 Ib ABC DRY CHEM
Admin Bldg	East Hallway	By Judy Tilk's office				
Admin Bldg	Basement Break room			3ZHFW	3ZHFX	5 Ib ABC DRY CHEM Cart-OP
Admin Bldg	Lab 1 East			3ZHG2	3ZHG3	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Lab 2 East			3ZHG4	3ZHG5	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Computer Room			32нғн	3ZHFJ	17 ib Halon 1211
Admin Bldg	Computer Room			3ZHFK	3ZHFL	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFM	3ZHFN	17 lb Halon 1211
Admin Bldg	Computer Room			ЗХНГР	3ZHFQ	17 lb Halon 1211
Admin Biding	Mail Room			3ZHFT	3ZHFV	15 lb Carbon Dioxide
Admin Blding	Lab 1 West		Q41	32НFY	3ZHFZ	15 lb Carbon Dioxíde
Casting	@ Furnace	Under Baghouse	C7	3ZHGJ	3ZHGK	10 lb Carbon Dioxide
Casting	Skimming - Platform	Skimmings Downstairs	C33	3ZHF7	3ZHF8	15 lb Carbon Dioxide
Casting	Skimming- Platform	Skimmings Upstairs	C34	3ZHF9	3ZHFB	15 lb Carbon Dioxide
Casting	Electric Room 1	Zn Dust MCC North	C11	3ZHGX	3ZHGY	15 lb Carbon Dioxide
Casting	Electric Room 2	Zn Dust MCC West	C12	3ZHGZ	зхнно	15 lb Carbon Dioxide
Casting	Ship Office	Outside foremans office ?		3ZHG6	3ZHG7	20 lb Carbon Dioxide
Casting	Electric Room	MCC North	පි	3ZHGN	3ZHGP	20 lb Carbon Dioxide
Casting	Cadmium	Cd West Basement Wall	33	3ZHHC	ЗХННБ	20 lb Carbon Dioxide
Casting	East Building Platform	Die Cast Up	C24	3ZHJ2	3ZHJ3	20 lb Carbon Dioxide
Casting	Back Dr E maint	West Wall		3ZHJD	3ZHJF	20 lb Carbon Dioxide
Casting	Center Fl	Cathode Floor	C10	3ZHGV	3ZHGW	10 lb ABC Dry Chem
Casting	East Building North Door	Die cast North end	C26	ЗZННТ	ЗХННУ	20 Ib ABC DRY CHEM
Casting	New Sub Station	East	C36	3ZHMR	3ZHMS	20 Ib ABC DRY CHEM
Casting	Ship Office	Foremans Office	5	3ZHG8	3ZHG9	20 lb ABC DRY CHEM Cart-Op
Casting	Ship Office	O/S Metal Analyzing room	$^{\circ}$	3ZHGB	зхнес	20 Ib ABC DRY CHEM Cart-OP
Casting	By Scale	East Middle	ငဒ	3ZHGD	3ZHGF	20 Ib ABC DRY CHEM Cart-Op
Casting	SE corner	South East Corner	90	3ZHGG	32нен	20 Ib ABC DRY CHEM Cart-Op
Casting	West wall	West Middle	CS	эхнео	3ZHGR	20 Ib ABC DRY CHEM Cart-Op
Casting	North end	M/L holding Conveyor	2	3ZHGS	3ZHGT	20 lb ABC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn Dust East wall	C13	3ZHH7	3ZHH8	20 Ib ABC DRY CHEM Cart-Op
Casting	Cadmium	Cd south basement wall	C30	3ZHHF	3ZННG	20 to ABC DRY CHEM Cart-Op
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DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
Casting	Cadmium	Cd oxide room basement	C29	3ZHHH	3ZННЛ	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium office	Cd office	C28	32ННК	ЗХННС	20 Ib ABC DRY CHEM Cart-Op
Casting	By W Ramp	Cd west door	C32	32HHM	3ZHHN	20 Ib ABC DRY CHEM Cart-Op
Casting	Center Wall	Zn Dust Baghoust	C17	ЗХННР	3ZHHQ	20 Lb ABC DRY CHEM Cart-Op
Casting	East Bldg Center Hoist	T Metal pin press	C35	3ZHHW	32ннх	20 lb ABC DRY CHEM Cart-Op
Casting	East Bldg S Dr	Die Cast down	C23	3ZHJO	3ZHJ1	20 lb ABC DRY CHEM Cart-Op
Casting	Maintenance Warehouse	Old Zn dust 2nd floor E	C20	3ZHJG	3ZНЈН	20 lb ABC DRY CHEM Cart-Op
Casting	Maintenance 2nd Level	Old Zn dust 2nd floor N	C21	3ZHJL	3ZHJM	20 lb ABC DRY CHEM Cart-Op
Casting	3rd Level Maintenance	Old Zn Dust 3rd floor	C22	3ZHJN	3ZHJP	20 lb BC DRY CHEM Cart-Op
Casting	Maintenance Whse	Old Zn dust north wall	C19	3ZHJQ	3ZHJR	20 lb BC DRY CHEM Cart -Op
Casting	Maintenance Front Door	Old Zn dust East wall	C18	3ZHJS	3ZHJT	20 lb BC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn dust North Blowbin	C14	3ZHH1	32НН2	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust South blowbin	C15	3ZHH3	3ZHH4	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust basement	C16	3ZHH5	3ZHH6	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust baghouse	C17	32НН9	ЗХННВ	30 lb Class D Cart-Op
Casting	Electric room	MCC South	ဗေ	3ZHGL	3ZHGM	20 lb Carbon Dioxide
Casting	New Sub Station	West	C37	3ZHMT	3ZHMV	20 lb ABC DRY CHEM
Casting	East Bldg W Wall	Die Cast west wall	C25	32ННУ	3ZHHZ	20 Ib ABC DRY CHEM Cart-Op
Cellroom	Unit 1 Substation	1st Floor, East of Store rm	M5	3ZHM3	3ZHM4	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North wall -Center		3ZHM5	3ZHM6	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North of Stairs		3ZHM7	3ZHM8	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd Floor Top of Stairs		3ZHM9	3ZHMB	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	Electrician office - West side	-	3ZHMC	3ZHMD	15 lb Carbon Dioxide
Cellroom	Sub Station #8	By South Door		3ZHMP	3ZHMO	20 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floof center, wheel unit		3ZHMF	3ZHMG	50 lb Carbon Dioxide
Celtroom	Unit 1 Substation	2nd floor North, wheel unit		эхнмн	3ZHMJ	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st floor by drill press		3ZHM1	3ZHM2	20 Ib ABC DRY CHEM cart-Op
Cellroom	Unit 1 Substation	2nd floor by west door		3ZHMK	3ZHML	20 Ib ABC DRY CHEM Cart-OP
Cellroom	Unit 1 Substation	2nd floor, South center wall		3ZHMM	3ZHMN	20 lb ABC DRY CHEM Cart-Op
Cellroom	Elect room	MCC Below Office	77	3ZHLL	3ZHLM	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East wall - North	M17	3ZHLV	3ZHLW	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - Center	M18	3ZHLX	3ZHLY	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - South	M19	3ZHLZ	3ZHMO	10 lb Carbon Dioxide
Cellroom	Prod Area	North - By steps		3ZHLS	3ZHLT	15 lb Carbon Dioxide
Cellroom	Sub 13	Outside East Door		3ZHJV	3ZHJW	20 lb Carbon Dioxide

DEPARTMENT	IOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	ТҮРЕ
Cellroom	Control room	W. Foremans Office	<u>T</u>	3ZHLP	3ZHLN	20 Ib ABC DRY CHEM
Celiroom	TCA Towers Ground N	Column	T14	3ZHLO	3ZHL1	20 ib ABC DRY CHEM Cart-Op
Celiroom	TCA Towers Ground N	By catwalk over hot sump	T14	3ZHL2	эхнгэ	20 lb ABC DRY CHEM Cart-Op
Cellmom	TCA Towers SW	Fan Floor		3ZHL4	3ZHL5	20 lb ABC DRY CHEM Cart-Op
Cellroom	TCA Towers NW	Fan Floor		3ZHL6	3ZHL7	20 lb ABC DRY CHEM Cart-Op
Cellroom	South	S. Basement	8	3ZHLD	3ZHLF	20 to ABC DRY CHEM Cart-Op
Cellroom	Center	Center Basement West	13 EL	3ZHLG	3ZНГН	20 lb ABC DRY CHEM Cart-Op
Cellroom	Center	Basement West		3ZHLJ	3ZHLK	20 Ib ABC DRY CHEM Cart-Op
Cellroom	Control room	S. Cellroom	T3	3ZHLQ	3ZHLR	20 lb ABC DRY CHEM Cart-Op
Cellroom	Head Tankman Shack	Outside East Door	T12	3ZHQZ	3ZHRO	20 Ib ABC DRY CHEM Cart-Op
Cellroom	TCA Shack	By Water fountain		3ZHL8	3ZHL9	5 lb ABC DRY CHEM Cart-Op
Cellroom	Unit # 3	Stripping floor - North		3FZSL	3FZSM	20 Ib ABC DRY CHEM
Cellroom	Unit # 3	Stripping floor - Mid		3FZSK	3FZSJ	20 Ib ABC DRY CHEM
Cellroom	Unit # 3	Stripping floor- South		3FZSH	3FZSG	20 Ib ABC DRY CHEM
Cellroom	Unit # 3	Basement - South		3FZSQ	3FZSR	20 Ib ABC DRY CHEM
Cellroom	Unit # 3	Basement - North		3FZSS	3FZST	20 Ib ABC DRY CHEM
Cellroom	Sub # 11	West wall		3FZS4	3FZS5	20 lb Carbon Dioxide
Cellroom	Sub # 11	East wall		3FZSB	3FZSC	20 lb Carbon Dioxide
Cellroom	Sub # 11	North wall -West		3FZS6	3FZS7	20 lb Carbon Dioxide
Cellroom	Sub # 11	North wall - East		3FZS8	3FZS9	20 lb Carbon Dioxide
Cellroom	Clean-up cells	Southwest corner		3FZSN	3FZSP	20 Ib ABC DRY CHEM
Cellroom	Gypsum removal towers	Top- Northeast corner		зхнах	3ZHQY	20 Ib ABC DRY CHEM
Cellroom	North Basement	NE of high press. pump	L17	3ZHPK	3ZHPL	20 lb ABC DRY CHEM cart-Op
100						
Engineering	Copy room	On floor by door		3ZHNN	3ZHNP	20 Ib ABC DRY CHEM
Leach Purification	Weak Acid Leach	By # 1 tank, North by door		3ZHP5	3ZHP6	20 Ib ABC DRY CHEM
Leach/Purification	MCC by paper press area	Inside MCC (Blueroom)		3ZHQS	3ZHQT	10 lb Carbon Dioxide
Leach/Purification	# 9 Substation	North End		3ZHP7	3ZHP8	15 lb Carbon Dioxide
Leach/Purification	# 9 Substation	South End	L31	3ZHP9	3ZНРВ	15 lb Carbon Dioxide
Leach/Purification	O/S Maint			3ZНРН	3ZHPJ	15 lb Carbon Dioxide
Leach/Purification	1st Stage	Midway by air drier		3ZHQ0	3ZHQ1	15 lb Carbon Dioxide
Leach/Purification	Leach	South of #3 Leach Tank		3ZHPT	зхнру	20 lb Carbon Dioxide
Leach/Purification	2nd Stage	West pole by #1 Tank		3ZHQ4	3ZHQ5	20 lb Carbon Dioxide
Leach/Purification 2nd Stage	2nd Stage	East of Presses		3ZHQ8	3ZHQ9	20 lb Carbon Dioxide
Leach/Purification	Eimco Floor	West of #3 Eimco	[1	3ZHQ6	3ZHQ7	20 Ib ABC DRY CHEM

TATATATATA	NOIFYOO	C acitesol	RR7 #	E/C ! INIT	B/C SITE	TYPE
DEFANTIMENT	- 1	North of Eloc Motor on Tark	1	37HOI	37HOM	20 lb ABC DRY CHEM
Leach/Purification	residue	Southoost corner		27HON	37HOP	20 Ib ARC DRY CHEM
Leacn/Purification	ist Stage new presses	Southeast corner		מבוועניי	- CE 100	
Leach/Purification ZSM	ZSM	MCC Blower room		3ZHPC	ЗХНРО	20 ID ABC DRY CHEM Cart-Up
Leach/Purification	ZSM	South pole by locker	L32	3ZHPM	3ZHPN	20 lb ABC DRY CHEM cart-op
Leach/Purification	ZSM	Cd precip tanks by steps		ЗХНРР	3ZHPQ	20 to ABC DRY CHEM Cart-Op
	Leach	South of # 1 Leach Tank	-	3ZHPR	3ZHPS	20 lb ABC DRY CHEM cart-op
Leach/Purification	Leach	N. Calcine bin top	707	3ZHPW	3ZHPX	20 lb ABC DRY CHEM cart-op
	1st Stage	1st Stage North	F8	3ZHPY	3ZHPZ	20 lb ABC DRY CHEM cart-op
Leach/Purification 1st Stage	1st Stage	1st Stage South	607	3ZHQ2	3ZHQ3	20 lb ABC DRY CHEM cart-op
Leach/Purification Residue MCC	Residue MCC	Outside	L23	зхнав	3ZHQC	20 lb ABC DRY CHEM Cart-op
Leach/Purification Residue	Residue	Control room	124	3ZHQD	3ZHQF	20 Ib ABC DRY CHEM Cart-Op
Leach/Purification Residue Room	Residue Room	South Residue press		3ZHQG	ЗХНОН	20 lb ABC DRY CHEM cart-op
Leach/Purification Residue Room	Residue Room	North press control panel		зхнол	3ZHQK	20 lb ABC DRY CHEM Cart-Op
Leach/Purification Foremans Office	Foremans Office	South wall	£14	зхнаа	3ZHQR	20 lb ABC DRY CHEM cart-Op
Leach/Purification Press paper area	Press paper area	South	L15	3ZHQV	згнам	20 Ib ABC DRY CHEM Cart-OP
Leach/Purification Eimco Sump	Eimco Sump	East of deep leg pit	L18	3FZRV	3FZRT	
Leach/Purification	Leach/Purification Southwest Leach-down	S.W. of Leach tanks	7	3FZRY	3FZRZ	
Leach/Purification	Inside North door	North of # 3 Leach Tank	F3	3FZSO		
Leach/Purification	East of Classifier/Ball mill	On pole by ramp	L4	3FZRW		
Maintenance	Leach/Purification	Northwest of Maint. Shack		3ZHPF	3ZHPG	20 Ib ABC DRY CHEM
Maintenance	Casting-Near back door	Mounted to work bench		3ZHJB	3ZHJC	20 Ib ABC DRY CHEM Cart-Op
Maintenance	Cadmium	Maintenance shop		3ZHHR	зхннѕ	5 Ib ABC DRY CHEM Cart-OP
Maintenance	Cellroom Maintenance area	Northwest of welding booth		3ZHLB	3ZHLC	20 Ib ABC DRY CHEM Cart-Op
Maintenance	Gas pumps	west side		3ZHKP	32НКО	20 Ib ABC DRY CHEM Cart-Op
Maintenance	Main Compressor Room	Near West door		3ZHK5	3ZHK6	20 lb Carbon Dioxide
Maintenance	Main Compressor Room	Between #7 & 8 Air Control		3ZHK3	3ZHK4	20 Ib ABC DRY CHEM Cart-Op
Maintenance	Oil house	North side		3ZHK7	3ZHK8	20 Ib ABC DRY CHEM
Maintenance	Oil house	South side		3ZHK9	32НКВ	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset Hut	Front door		3ZHJ4	3ZHJ5	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset hut	Center		3ZH76	3ZHJ7	20 lb ABC DRY CHEM Cart-Op
Maintenance	Quanset hut	Back door		3ZHJ8	3ZHJ9	20 lb ABC DRY CHEM Cart-Op
Maintenance	Vehicle Shop	By bulk oil drum		3ZHN4	3ZHN5	15 lb Carbon Dioxide
Maintenance	Pump Shop	By parts wash	M27	3ZHND	3ZHNF	15 lb Carbon Dioxide
Maintenance	CRNE AP308	CP5		3ZHMW	3ZHMX	2.5 ABC DRY CHEM
Maintenance	SW Pole	East of hand wash area	M24	3ZHN6	3ZHN7	20 lb ABC DRY CHEM Cart-OP

Table 3 Fire Extinguisher Locations Big River Zinc Corporation Sauget, Illinols

Maintenance Vehicle Shop Maintenance Welding Shop Maintenance Crane CP1 Maintenance Crane CP1 Maintenance Crane CP1 Maintenance Crane CP1 Maintenance Cart CS7 Maintenance Cont CS7 Maintenance Cort CS7 Maintenance Cont By Maint. Pre-Leach Dy Maint. Pre-Leach Conveyor Pre-Leach By Hopper Pre-Leach Line East Pre-Leach Line Corter Pre-Leach Control room Pre-Leach Control room Pre-Leach Store room Purchasing Store room Purchasing Store room Purchasing Store room Purchasing Hallway Roast/ Acid Ore shed - Center	South door Near South door South wall Drott Go-Devil Northwest Corner Nest of horrizontal mill Inside on column WT Vaccum pump at steps Oil House	M25 3 3 M26 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3	B/C UNIT 3ZHN8 3ZHN3 3ZHNJ 3ZHNO 3ZHNZ 3ZHNZ 3ZHNZ 3ZHNG	B/C SITE 3ZHN9 3ZHNC 3ZHNK	20 Ib ABC DRY CHEM Cart-Op 20 Ib ABC DRY CHEM Cart-Op
	South door Near South door South wall Drott Go-Devil Northwest Corner Nest of horrizontal mill Inside on column WT Vaccum pump at steps Oil House		ZHN8 ZHNB ZHND ZHNO ZHNY ZHNZ ZHNZ ZHNZ ZHNG ZHNG	3ZHN9 3ZHNC 3ZHNK	20 Ib ABC DRY CHEM Cart-Op 20 Ib ABC DRY CHEM Cart-Op
	Near South door South wall Drott Go-Devil Northwest Corner Nest of horrizontal mill Inside on column WT Vaccum pump at steps Oil House		ZHNB ZHNO ZHNO ZHNZ ZHNZ ZHNZ ZHNZ ZHNG ZHNG	3ZHNC 3ZHNK	20 lb ABC DRY CHEM Cart-Op
	South wall Drott Go-Devil Northwest Corner Inside on column WT Vaccum pump at steps Oil House		ZHNJ ZHNO ZHNZ ZHNZ ZHNG ZHNG	3ZHNK	
	Drott Go-Devil Northwest Corner West of horrizontal mill Inside on column WT Vaccum pump at steps Oil House		ZHINO ZHINZ ZHINZ ZHINL ZHING ZHING		20 lb ABC DRY CHEM Cart-Op
	Northwest Corner West of horrizontal mill Inside on column WT Vaccum pump at steps Oil House		ZHMY ZHN2 ZHNL ZHNG ZHCF	3ZHN1	5 Ib ABC DRY CHEM
	Northwest Corner West of horrizontal mill Inside on column WT Vaccum pump at steps Oil House		ZHN2 ZHNL ZHNG ZHCF	3ZHMZ	5 lb ABC DRY CHEM Cart-Op
	Northwest Corner West of horrizontal mill Inside on column WT Vaccum pump at steps Oil House		ZHNL ZHNG ZHCF	3ZHN3	5 lb ABC DRY CHEM Cart-Op
	Nest of horrizontal mill Inside on column WT Vaccum pump at steps Oil House		ZHNG	3ZHNM	5 lb ABC DRY CHEM Cart-OP
			ZHCF	3ZHNH	30 lb Class D Cart-Op
מ מ מ מ מ			-	3ZHCG	15 lb Carbon Dioxide
מ מ מ מ			3ZHBS	3ZHBT	15 lb Carbon Dioxide
00000			згнвх	зzнву	15 lb Carbon Dioxide
י פי		•	згисн	3ZНСЛ	20 lb ABC DRY CHEM
ם מו מו מו מו		9	3ZHBV	3ZHBW	20 Ib ABC DRY CHEM Cart -OP
0 0 0 0 7		(7)	3ZHBZ	зхнсо	20 Ib ABC DRY CHEM Cart-Op
	-	(1)	3ZHC3	3ZHC4	20 Ib ABC DRY CHEM Cart-Op
		9	3ZHC5	3ZHC6	20 lb ABC DRY CHEM Cart-Op
		63	3ZHC7	3ZHC8	20 Ib ABC DRY CHEM Cart-Op
		6	3ZHCC	3ZHCD	20 lb ABC DRY CHEM Cart-Op
	East of Pre heater on Post	R33 3	3ZHCK	3ZHCL	20 lb ABC DRY CHEM Cart-Op
	Control room	R21 3	3ZHC1	3ZHC2	20 lb Carbon Dioxide
	Southwest Corner	S3 3	3ZHNS	3ZHNT	20 lb ABC DRY CHEM Cart-Op
	West pole	S2 3	3ZHNV	3ZHNW	20 lb ABC DRY CHEM cart-Op
	East pole	(6)	3ZHNX	3ZHNY	20 lb ABC DRY CHEM Cart-Op
	Between restrooms		3ZHNQ	3ZHNR	5 Ib ABC DRY CHEM Cart-Op
	Conc. Storage center	R2	3ZHCT	3ZHCV	15 lb Carbon Dioxide
		R20 3	3ZHCP	зхнсо	20 lb ABC DRY CHEM Cart-Op
Roast/Acid Acid Control Room	Acid Control	R19	3ZHCM	3ZHCN	15 lb Carbon Dioxide
Roast/Acid SE Substation	Motor Control Room-east	R15	3ZHD4	3ZHD5	15 lb Carbon Dioxide
Roast/Acid Elect Room SW	Motor Control Room-South	R18 3	3ZHD8	3ZHD9	15 lb Carbon Dioxide
	Motor Control Room-West	R16	3ZHDB	3ZHDC	15 lb Carbon Dioxide
Roast/Acid Sub Station # 7	Substation 7	R34	3ZHDD	3ZHDF	15 lb Carbon Dioxide
Roast/Acid Roaster Southeast		ţ-,	3ZHDL	3ZHDM	15 lb Carbon Dioxide
Roast/Acid Roaster East Stair		.,,	3ZHDQ	3ZHDR	15 lb Carbon Dioxide
Roast/Acid Roof Center	Hoist house 5th	R5	3ZHF5	3ZHF6	15 lb Carbon Dioxide
	lorth		3ZHCR	3ZHCS	20 ib ABC DRY CHEM Cart-OP

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

						Pull Service and Community of the Commun
DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
Roast/Acid	Ore Shed South	Conc. Storage South	R1	3ZHCW	3ZHCX	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed Train Dock NW		R25	ЗZНСУ	3ZHCZ	20 to ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed Train Dock SW	Conc. Unloading E	R26	3ZHDO	3ZHD1	20 to ABC DRY CHEM Cart-Op
Roast/Acid	Ore Shed Train Dock SE	Conc. Unloading- East	R27	3ZHD2	3ZHD3	20 lb ABC DRY CHEM Cart-OP
Roast/Acid	Roaster North	Roaster 1st Fir Windbox	R14	3ZHD6	3ZHD7	20 Ib ABC DRY CHEM Cart-Op
Roast/Acid	Roaster West Stairs	Air Compressor Building	R35	3ZHDG	нднzе	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster SW	Roaster 2nd FIr mid-West	R13	3ZHDJ	3ZHDK	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster Center			3ZHDN	3ZHDP	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster SE	Roaster 3rd floor-east	R9	SCHES	3ZHDT	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	Roaster SW	Roaster 3rd floor-west	R8	3ZHDV	3ZHDW	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	By Hoppers			згнрх	3ZHDY	20 Ib ABC DRY CHEM Cart-Op
Roast/Acid	By Hoppers	Roaster 4th floor	R6	3ZHDZ	3ZHFO	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	By Hoppers	Roaster 4th floor	R7	3ZHF1	3ZHF2	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Bin control	Shaker Screne room	R29	3ZHF3	3ZHF4	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Foremans Office	Foremans office	R36	3ZHC9	3ZHCB	5 Ib ABC DRY CHEM
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		3ZHRS	3ZHRT	15 lb Carbon Dioxide
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		W-878545		20th Carbon Dioxide
Safety	Wash room			3ZHKW	3ZHKX	20 Ib ABC DRY CHEM
Safety	Store room			3ZHKY	3ZHKZ	20 lb ABC DRY CHEM
Security	Lunchroom	South wall by light switch	80S	3ZHKT	3ZHKV	20 Ib ABC DRY CHEM
Security	Mens Locker room	Dirty side E wall by coat rack	S10	3ZHP3	3ZHP4	15 lb Carbon Dioxide
Security	Mens locker room	W wall next to boiler room	S12	3ZHNZ	3ZHPO	20 Ib ABC DRY CHEM Cart-Op
Security	Mens locker room	S Wall next to thermostat	S11	3ZHP1	3ZHP2	20lb ABC DRY CHEM Cart-Op
Security	Guard shack lobby	North wall clock alley	S16	3ZHKR	3ZHKS	20 Ib ABC DRY CHEM Cart-Op
Security	Womens locker room	S wall in hall/salary side	S15	3ZHJZ	32НКО	20 Ib ABC DRY CHEM
Security	Womens Locker room	N wall in hall/hourly side	S14	3ZHK1	3ZHK2	5 Ib ABC DRY CHEM
	- 1					
Spare	Safety Storage			3ZHRJ	3ZHRK	10 lb ABC Dry Chem
Spare	Safety storage			3ZHR1	3ZHR5	20 Ib ABC DRY CHEM
Spare	Safety Storage			3ZHR2	3ZHR5	20 Ib ABC DRY CHEM
Spare	Safety Storage			3ZHR3	3ZHR5	20 Ib ABC DRY CHEM
Spare	Safety Storage			3ZHR4	3ZHR5	20 Ib ABC DRY CHEM
Spare	Safety Storage			3ZHR6	3ZHRC	20 lb ABC DRY CHEM Cart_op
Spare	Safety Storage			3ZHRT	3ZHRC	20 lb ABC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHR9	3ZHRC	20 lb ABC DRY CHEM Cart-Op

.

Page B-7

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
Spare	Safety Storage		m	3ZHRB	3ZHRC	20 lb BC DRY CHEM Cart-Op
Spare	Safety Storage		m	3ZHRD	3ZHRF	30 lb Class D Cart-Op
Spare	Safety Storage		n	3ZHRG	3ZHRH	17 lb Halon 1211
Spare	Safety Storage		n	3ZHRQ	3ZHRR	2.5 Gallon Pressurized Water
Spare	Safety Storage		m	3ZHR8	3ZHRC	20 to ABC DRY CHEM Cart-Op
Spare	Safety Storage		က	3ZHRL	3ZHRM	5 Ib ABC DRY CHEM
Test Plant	Pilot Bay	By telephone	8	3ZHKK	3ZHKL	20 lb Carbon Dioxide
Test Plant	Annex	By East door	n	3ZHKC	3ZHKD	20 Ib ABC DRY CHEM
Test Plant	Zinc Powder		က	3ZHKF	3ZHKG	20 Ib ABC DRY CHEM
Test Plant	Office	By Restroom	e	3ZHKM	3ZHKN	5 lb ABC DRY CHEM cart-OP
Test Plant	Zinc Powder	Platform	n	32нкн	3ZHKJ	30 lb Class D Cart-Op



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JAN 0 7 2009

RECEIVED JAN 0 8 2009

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

George Obeldobel
President
Big River Zinc Corporation
2401 Mississippi Avenue
Sauget, Illinois 62201

Re: Request for Information EPA ID No.: ILD062444435

Dear Mr. Obeldobel:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Big River Zinc Corporation ("BRZ" or "you") to submit certain information relating to the storage of hazardous waste at its facility located at 2401 Mississippi Avenue in Sauget, Illinois. We are requiring this information to determine BRZ's compliance status with the Standards Applicable to Generators of Hazardous Waste and the Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities set forth at Title 35 of the Illinois Administrative Code (35 IAC), Parts 722 and 724, respectively. The enclosure specifies the information you must submit. You must submit this information within 14 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Todd C. Brown, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

BRZ must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should

the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject BRZ to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,

Lorna M. Jereza

Chief, Compliance Section 1

RCRA Branch

Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (w/ enclosure)
Julie O'Keefe, Armstrong Teasdale LLP (w/ enclosure)

REQUEST FOR INFORMATION

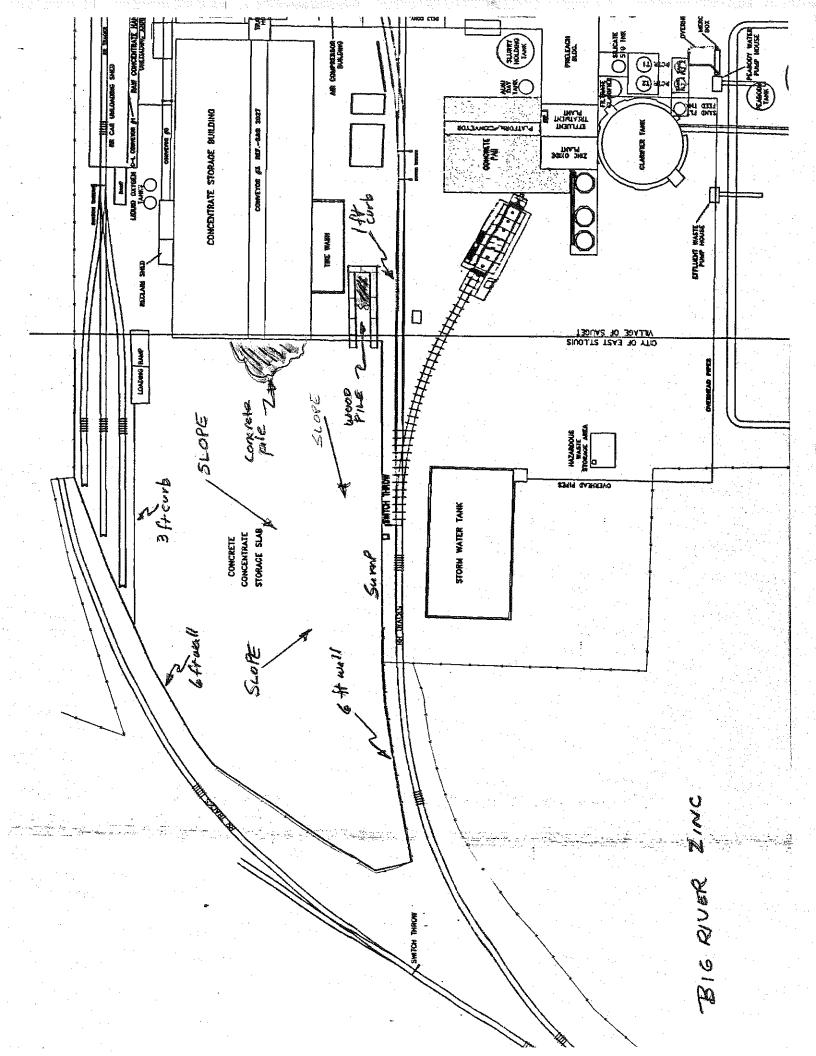
Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

- Identify all persons consulted in preparing the answers to this Request for Information.
 Provide the full name and title for each individual identified, business telephone number for each individual identified, and the number of years that each individual has worked for BRZ.
- Please provide true and accurate copies of all records that report the results of the analyses conducted on samples taken from the demolition of the Leach Building, including the analytical results obtained from any samples taken from demolished concrete, wood and brick.
- Please describe the condition of the Concrete Concentrate Storage Pad located on the northeast corner of the plant, which was used by BRZ to store hazardous waste debris generated from its demolition activities. In particular:
 - a. identify any cracks or gaps in the floor of the concrete pad;
 - b. describe any coatings or sealants existing on the surface of the concrete pad;
 - c. describe the walls or barriers around the concrete pad;
 - d. provide information regarding any inspections or maintenance of the concrete pad by BRZ in the last ten years; and
 - e. describe in detail how runoff from the concrete pad is managed.
- 4. State whether the pile of contaminated wood located immediately to the west of the Concentrate Storage Building and observed by the U.S. EPA inspector during the September 19, 2007 EPA inspection (featured in photograph 11 of the corresponding inspection report) was also located on the Concrete Concentrate Storage Pad.
- 5. If the answer to 4, above, is negative, describe the condition of the surface upon which the pile of contaminated wood was located. In particular:
 - a. identify if there was any concrete or other surface separating the pile from the underlying soil;
 - b. if the answer to 5a, above, is affirmative, identify any cracks or gaps in the concrete or surface material;
 - c. if the answer to 5a, above, is affirmative, describe any coatings or sealants existing on the concrete or surface material;

- d. if the answer to 5a, above, is affirmative, provide information regarding any inspections or maintenance of the concrete or surface conducted by BRZ in the last ten years; and
- e. describe in detail how runoff from the area is managed.
- 6. Please provide a copy of Big River Zinc's Hazardous Waste Contingency Plan as it existed on September 19, 2007.
- 7. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



BIG RIVER ZINC CORPORATION

2401 Mississippi Avenue Sauget, Illinois 62201 618 274 5000

Lorna M Jereza Chief, Compliance Section 1 RCRA Branch Land and Chemicals Division

Attention: LR-8J Mr. Todd Brown

Re: Request for Information from Big River Zinc Corporation dated Jan 7, 2009

Dear Ms Jereza,

The following are the responses to your request for information dated January 7, 2009.

Request 1

Michael A Altepeter Environmental Manager/Senior Process Engineer 618 274 5000 x 194 618 410 8021 cell 35 years

Joe Rook
Maintenance Superintendent
618 274 5000 x 196
30 years
Mr. Rook helped to find drawings.

Request 2

A significant number of samples were submitted for TCLP before demolition began to develop a material handling plan. TLCP tests were performed on additional samples during the demolition to verify the preliminary results and to segregate materials by category.

Copies of TCLP analysis of all concrete, wood, and brick are attached. A worksheet summary used during the demolition project is included.

Request 3

The concentrate storage pad is used for unloading and storing Zinc Concentrates. The pad is six to eight inch reinforced concrete with compacted underlayment. The pad covers about 1.3 acres. A few hundred square feet were used to manage the wastes and prepare them for shipment as required by the landfill. A Plan view is enclosed.

- a. The pad cannot be inspected at this time because half of it is covered with ice and the entire pad is covered with snow. The weather is to remain cold in the near future and more snow is expected this week. However I do not recall any actual gaps that go all the way through the concrete, although the concrete is chipped off in some areas.
- b. The pad has no coatings.
- c. The pad is surrounded by a concrete curb or wall and all water collected is drained to a sump. The height varies from 1 foot to 6 foot as shown on the enclosed drawing. The walls and curbs are made of concrete.
- d. The pad was repaired in 2002 and the invoice for the repairs is enclosed. The cost of those repairs was about \$60,000.
- e. The concentrate pad drains to the sump as shown on the enclosed drawing. The sump pumps the water to the storm water storage tank located just east of the concentrate pad as shown on the drawing enclosed. The water from the Stormwater holding tank is metered to the Big River Zinc Corporation wastewater treatment plant. The treated effluent is sent to American Bottoms Physical Chemistry plant and from there to American Bottoms sewage treatment plant.

Request 4

The area where the wood was managed was located on concrete which is part of and drains to the concentrate storage pad.

The contaminated wood was placed in a bunker made of 4' x 8' x 8' concrete cells. This center was located just east of the ore storage shed as shown on the drawing referred to in Request 3. The concrete cell enclosure was eight feet from the concrete curb which is the east boundary of the concentrate storage pad.

Request 5

See request 4.

Request 6

A copy is enclosed.

Request 7

See certification following.

If you need to clarify the answers above do not hesitate to call me at 618 274 5000 x 194 or by e-mail at <a href="mailto:mailto

Sincerely

Michael A Altepeter

Environmental Manager/Senior Process Engineer

hel allegation

Big River Zinc Corporation

CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

George M Obeldobel

President

Big River Zinc Corporation

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 2

Analytical reports of TCLP for Metals

Data Summary used during demolition of Leach Building

Building	3
In L/P	
Results i	

Samples of Brick taken 8/1/07 contaminated brick Samples Taken from wood stave tanks 8/7/07 #5 Check tank process Water tank #4 check Tank 3rd stage tank 4.2			•	?	7		!		
n from wood 707 tank	0.0	260	0.0055	36	0.13	<0.003	<0.0002	FAIL	
rank		9.	0.048	0.42	0.065	0.0065	<0.0002	FAIL	
	0.18 0.05 ^ 2.0	4.1 460 1300	0.027 0.035 0.019	7.7 7.3 7.4	<0.02 0.096 0.2	0.0042 0.0063 0.015	<0.0002 <0.0002 <0.0002	FAIL FAIL FAIL	
				·					
2nd Stage Cooling tower steps <0.03 Eimco Basement Wall <0.03		<0.004 <0.004	0.11	<0.02	0.14	<0.003 <0.003	<0.0002		. *
1st Stage Purification 4.7 2nd Stage press floor <0.03	0.3	4.8	<0.004 0.05	0.41<0.02	0.1	<0.003 <0.003	<0.0002	FAIL	
ank		<0.004	0.035	0.086 <0.02	0.15	<0.003	<0.0002	FAIL	
Samples taken of concrete 8/21/07									•
Cadmium Floor 0.056 Eimco Floor 0.033		<.004 0.77	<.004 0.17	<.02 0.19	0.16	0.0034	<0.0002		
First Stage Floor		<0.004	0.031	40 02 40 02 40 02	41.0	0.0053	<0.0002		
		0.17	<0.004 40.004	40.0 2	0.058	0.0041	<0.0002		
Eimco basement Wall 2nd Stage Press floor <0.03	0.42	5.2	0.21	<0.02	0.021	0.0057	<0.0002	FAIL	

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 2

Analytical reports of TCLP for Metals

Laboratory Results for Brick from Brick Lined Tanks



3278 N. Highway 67 • Florissant, MO 63033 (314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977



Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received: 08/02/07 14:37

Report Date :08/10/07 Customer # :201097 P.O. Number :34339

Sample No: 07088038-6		* + +	Collect Date 08/01/07	00:01	
Client ID: CONTAMINATED BRICK	Site: STL		Locator :		
Parameter	Qualifier	Result	Analysis Date	Analyst	
SW-846 1311					
Final pH Leachate Preparation		5.07	08/06/07 11:00 08/06/07 11:00	MEP MEP	
SW-846 3010A		1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	00/00/07 11:00	WEF	
Sample Preparation			08/08/07 08:00	JS	.1+
5W-846 6010 TCLP					
Arsenic, TCLP		0.3 mg/l	08/08/07 16:06	WPS	
Arsenic, TCLP Spike Recovery Barium, TCLP		118 % Recc 0.15 mg/l	verv 08/08/07 16:06	WPS	
Barium, TCLP Spike Recovery Cadmium, TCLP		99.4 % Reco 260 mg/l	verv 08/09/07 11:46	WPS	
Cadmium, TCLP Spike Recovery Chromium, TCLP		100 % Reco	verv 08/08/07 16:06	WPS	
Chromium, TCLP Spike Recovery Lead, TCLP		108 % Reco 36 mg/l	the state of the s	WPS	
Lead, TCLP Spike Recovery Selenium, TCLP		80 % Reco 0.13 mg/l		WPS	
Selenium, TCLP Spike Recovery	40 - 1	107 % Reco	•	WIS	
Silver, TCLP Silver, TCLP Spike Recovery	«	0.003 mg/l	08/08/07 16:06	WPS	٠
W-846 7470A R1.0		101 % Reco	verv		
			·	er e	
Mercury Spike Recovery Mercury, TCLP	<	90 % 0.0002 mg/l	08/09/07 14:00 08/09/07 14:00	KAE KAE	



PDC Laboratories, Inc. 3278 N. Highway & Florissant, MC 6303-(614) 432-0550 • (800) 333-FAST (3278) • FAX (614) 432-4977



Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ανε.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received: 08/02/07 14:37

Report Date: 08/10/07 Customer #: 201097

P.O. Number :34339

Facility:

ACCREDITATIONS

NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100253.

Certified by: Nabas G. Pandillo Barbara G. Pandolfo, Project Manager

This report shall not be reproduced, except in full, without the written approval of the laboratory.

311243	PROJECT #	# Od	PAGE	ANALYSES RECLIFIED		Metals 1								TO BORCHAL NOTES INSTALLS		
ANSFER RECORD	OTYISTATEIZIE SENGET IN OLZO FAX (18 812 74 444	1. 274 5000 E-Mail (Nat (Hilder C Dignicozoner) 1. O. Doys Fastrak (3 businese days) Sobre Same Day Due Daile Due Dail	INSTAUCTIONS: Urax C E-Mail C Phone Call		E SAMINALE DESCRIPTION COLLECTED COLLECTED PRESERV. CONTAINER	2 W1837 1812 121 Resign 1	m1837 day 4 Gh38 13	Central 12 & 8/1/07 101	3	01	12	13		The RECEIVED BY Date Time RECEIVED BY Time REASON for	1 10 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1	14 1840-001 INEV 4,001 (12) 12) 12 ST HORTOLICANOR (8 16) 1-25

Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 2

Analytical reports of TCLP for Metals

Laboratory Results for Wood from Wood Stave Tanks



3278 N. Highway 67 • Florissant, MO 63033 (314) 432-0550 • (800) 333-FAST (3278) • FAX (314) 432-4977



WPS

WPS

WPS

WPS

WPS.

WPS

Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

62201 Sauget, IL Attn: Mr. Mike Altepeter

Cadmium, TCLP

Chromium, TCLP

Selenium, TCLP

Mercury, TCLP

Mercury Spike Recovery

Lead, TCLP

Silver, TCLP SW-846 7470A R1.0 Date Received: 08/08/07 09:30

Report Date : 08/15/07 Customer # : 201097 P.O. Number : 34339

Facility:

08/14/07 16:39

08/14/07 16:39

08/14/07 16:39

08/14/07 16:39

08/15/07 12:00

08/15/07 12:00

Sample No: 07088140-4	a company of the same of the s		Collect Date 08/07/07 08	3:00	
Client ID: #5 CHECK TANK	Site : STL		Locator:		
Parameter	Qualifier	Result	Analysis Date	Analyst	
SW-846 1311				a. 6 p == 10	
Final pH Leachate Preparation		4.67	08/13/07 12:00 08/13/07 12:00	MEP MEP	
SW-846 3010A	e de la companya de		00.04.407.00.00	JS	
Sample Preparation			08/14/07 08:00	JO	
SW-846 6010 TCLP				NA ETIO	
Arsenic, TCLP Barium, TCLP	<	0.03 mg/l 0.06 mg/l 1.6 mg/l	08/14/07 16:39 08/14/07 16:39 08/14/07 16:39	WPS WPS WPS	

0.048 mg/l

0.42 mg/i

0.065 mg/l

0.0065 mg/l

115%

0.0002 mg/l

ACCREDITATIONS

NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100253.

Certified by: Sahara G. Pandolfo, Project Manager

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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received: 08/08/07 09:30

Report Date : 08/15/07 Customer # : 201097 P.O. Number : 34339

ample No: 07088140-2		C	Collect Date 08/07/07 08:25	
Client ID: PROCESS WATER TANK	Site: STL		Locator:	
Parameter	Qualifier	Result	Analysis Date	Analyst
W-846 1311				
		4.68	08/13/07 12:00	MEP
Final pH Leachate Preparation			08/13/07 12:00	MEP
		4		
W-846 3010A		-	08/14/07 08:00	JS
Sample Preparation			00,14,07 00.00	
W-846 6010 TCLP	t e			
Arsenic, TCLP		0.27 mg/l	08/14/07 16:23	WPS
Barium, TCLP		0.18 mg/l	08/14/07 16:23	WPS
Cadmium, TCLP		4.1 mg/l	08/14/07 16:23	WPS
Chromium, TCLP	i.	0.027 mg/l	08/14/07 16:23	WPS
Lead, TCLP		1.7 mg/l	08/14/07 16:23	WPS WPS
Selenium, TCLP	<	0.02 mg/l	08/14/07 16:23	WPS
Silver, TCLP		0.0042 mg/l	08/14/07 16:23	VVIC
:W-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS
ample No: 07088140-3			Collect Date 08/08/07 08:00	
Client ID: #4 CHECK TANK	Site: STL		Locator:	
Parameter	Qualifier	Result	Analysis Date	Analyst
			·	
SW-846 1311			00/42/07 42-00	MEP
Final pH		5.27	08/13/07 12:00 08/13/07 12:00	MEP
Leachate Preparation			06/13/07 12.00	WICF
SW-846 3010A				
Sample Preparation	•		08/14/07 08:00	JS
	i e e e e e e e e e e e e e e e e e e e			
SW-846 6010 TCLP		1.4 mg/l	08/14/07 16:36	WPS
Arsenic, TCLP		0.05 mg/i	08/14/07 16:36	WPS
Barium, TCLP		460 mg/1	08/15/07 11:39	WPS
Cadmium, TCLP		0.035 mg/l	08/14/07 16:36	WPS
Chromium, TCLP		7.3 mg/l	08/14/07 16:36	WPS
Lead, TCLP	•	0.096 mg/l	08/14/07 16:36	WPS
Selenium, TCLP Silver, TCLP		0.0063 mg/l	08/14/07 16:36	WPS
$\gamma \in \mathcal{F}$				
SW-846 7470A R1.0	<	0.0002 mg/l	08/15/07 12:00	WPS
Mercury, TCLP	<	v.oouz myn	OCH LOVO / ILLOO	• • •



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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received :08/08/07 09:30

Report Date :08/15/07 Customer # :201097 P.O. Number :34339

Sample No: 07088140-1		(Collect Date 08/07/0	7 08:15
Client ID: 3RD STAGE TANK	Site: STL	المناسبة المناسبة المناسبة المناسبة المناسبة المناسبة	Locator:	
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311	•			
Final pH Leachate Preparation		5.88	08/13/07 12:00 08/13/07 12:00	MEP MEP
SW-846 3010A			:	
Sample Preparation			08/14/07 08:00	JS
SW-846 6010 TCLP		· · · · · · · · · · · · · · · · · · ·		
Arsenic, TCLP		4.2 mg/l	08/15/07 10:00	WPS
Arsenic, TCLP Spike Recovery Barium, TCLP	<	116 % Recor 2 mg/l	verv 08/15/07 10:26	WPS
Barium, TCLP Spike Recovery Cadmium, TCLP		104 % Reco 1300 mg/l	verv 08/15/07 10:26	WPS
Cadmium, TCLP Spike Recovery Chromium, TCLP		100 % Reco 0.019 mg/l	verv 08/15/07 10:00	WPS
Chromium, TCLP Spike Recovery Lead, TCLP		102 % Reco 7.4 mg/l	verv 08/15/07 10:26	WPS
Lead, TCLP Spike Recovery Selenium, TCLP		106 % Reco 0.2 mg/l	verv 08/15/07 10:00	WPS
Selenium, TCLP Spike Recovery Silver, TCLP		120 % Reco 0.015 mg/l	verv 08/15/07 10:00	WPS
Silver, TCLP Spike Recovery		101 % Reco	very	n en versioner i de la versioner de la versione La versioner de la versioner d
SW-846 7470A R1.0				
Mercury, TCLP	· •	0.0002 mg/l	08/15/07 12:00	WPS

	ROJENTI PROJECTION OF SOLUTION	TE SAMPLE DA SAMPLE BANGE S SAMPLE DA SAMPLE SAMPLE DA S	278 / F(67) 5/89 S/89 LLECTE	aboratorics Utwy 67 SSant mo S NOU NOU ///	ACCUSTODY TRANSFER RECORD AND LABORATORY WORK R LAGGED AND LABORATORY WORK RESULTS TO: Stim Lanza Analysis required TYPE OF ANALYSIS REQUIRED ANALYSIS REQUIRED ANALYSIS REQUIRED A C D D C D D C D D D D D D D D D D D D	REI REI	Cd ba Cr	NA RESULT	REPORT RESULTS TO: ANALYSIS R	RECORD AND LABOR. RSULTS TO: 2 in ANALYSIS REQUIRED ANALYSIS CAPA C P D Sc APA	Se Ag	NEG T	WE TO	Lanzafame Lanzafame Telp Analys w/Iday Tun around
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2 8-13-07 8:30 Am For Shindsman HOrtholysman La	ITEMS TRANSFRD D	DATE		RELINQUISHED BY:	RECEIVED BY:	REASON FOR TRANSFER
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Region V Request for Information from Big River Zinc Corporation Dated Jan 7, 2009

Request number 2

Analytical reports of TCLP for Metals

Laboratory Results for Concrete from Floors and Basement Walls in Leach Building



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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received :08/13/07 15:55

Report Date : 08/16/07 Customer # : 201097 P.O. Number : 34339

Sample No: 07088200-1		Collect Date 08/09/07 10:00
Client ID : CONCRETE STEPS	Site: STL	Locator: OLD COOLING TOWER

CHRIED. CONCRETE STEES				
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH	•	11.38	08/14/07 13:00	MEP
Leachate Preparation		·	08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				•
Arsenic, TCLP	<	0.03 mg/l	08/15/07 11:13	WPS
Barium, TCLP	•	0.18 mg/i	08/15/07 11:13	WPS
Cadmium, TCLP	<	0.004 mg/l	08/15/07 11:13	WPS
Chromium, TCLP		0.11 mg/l	08/15/07 11:13	- WPS
Lead, TCLP	<	0.02 mg/i	08/15/07 11:13	WPS
Selenium, TCLP		0.14 mg/l	08/15/07 11:13	WPS
Silver, TCLP	<	0.003 mg/l	08/15/07 11:13	WPS
SW-846 7470A R1.0				
Mercury Spike Recovery		110%	08/15/07 12:00	WPS
Mercury TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS



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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201

Attn: Mr. Mike Altepeter

Date Received: 08/13/07 15:55

Report Date : 08/16/07 Customer # : 201097

P.O. Number : 34339

Sample No: 07088200-2 Client ID: EIMCO BASEMENT WALL	Site: STL	(Collect Date 08/09/07 Locator: UNDER	
Parameter Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311 Final pH Leachate Preparation		11.11	08/14/07 13:00 08/14/07 13:00	MEP MEP
SW-846 3010A Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP Arsenic, TCLP Spike Recovery	<	0.03 mg/l 137 % Reco		WPS
Barium, TCLP Barium, TCLP Spike Recovery Cadmium, TCLP	<	0.18 mg/i 103 % Reco 0.004 mg/i	08/15/07 11:16 verv 08/15/07 11:16	WPS WPS
Cadmium, TCLP Spike Recovery Chromium, TCLP		110 % Reco	08/15/07 11:16	wps
Chromium, TCLP Spike Recovery Lead, TCLP	<	107 % Reco 0.02 mg/l 108 % Reco	08/15/07 11:16	WPS
Lead, TCLP Spike Recovery Selenium, TCLP		0.15 mg/l	08/15/07 11:16	WPS
Selenium, TCLP Spike Recovery Silver, TCLP	<	0.003 mg/l	08/15/07 11:16	WPS
Silver, TCLP Spike Recovery SW-846 7470A R1.0 Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS



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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received : 08/13/07 15:55

Report Date : 08/16/07 Customer # : 201097 P.O. Number : 34339

ample No: 07088200-3	•		Collect Date	:05
Client ID: 1ST STG.PURIFICATION	Site: STL	·	Locator:	
Parameter	Qualifier	Result	Analysis Date	Analyst
W-846 1311				
Final pH		6.39	08/14/07 13:00	MEP
Leachate Preparation	•		08/14/07 13:00	MEP
:W-846 3010A				
Sample Preparation		•	08/15/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		4.7 mg/l	08/15/07 11:43	WPS
Barium, TCLP	•	0.3 mg/l	08/15/07 11:43	WPS
Cadmium, TCLP	•	4.8 mg/l	08/15/07 11:43	WPS
Chromium, TCLP	. <	0.004 mg/l	08/15/07 11:43	₩₽S
Lead, TCLP		0.41 mg/l	08/15/07 11:43	WPS
Selenium, TCLP	•	0.1 mg/l	08/15/07 11:43	WPS
Silver, TCLP	<	0.003 mg/l	08/15/07 11:43	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS
ample No: 07088200-4			Collect Date 08/10/07 14	k:15
Client ID: 2ND STG.PRESS FLOOR	Site: STL		Locator:	
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311		· .		
Final pH		9.26	08/14/07 13:00	MEP
Leachate Preparation			08/14/07 13:00	MEP
5W-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				
		0.03 mg/l	08/15/07 11:46	WPS
Arsenic, TCLP Barium, TCLP		0.03 mg/t	08/15/07 11:46	WPS
Cadmium, TCLP		0.0075 mg/l	08/15/07 11:46	WPS
Chromium, TCLP		0.05 mg/i	08/15/07 11:46	WPS
Lead, TCLP	<	0.02 mg/l	08/15/07 11:46	WPS
	•	0.18 mg/i	08/15/07 11:46	WPS
Selenium TCI P		V V		**** •
Selenium, TCLP Silver, TCLP	. <	0.003 mg/l	08/15/07 11:46	WPS
Silver, TCLP	<	0.003 mg/l	08/15/07 11:46	WPS
	<	0.003 mg/l 0.0002 mg/l	08/15/07 11:46 08/15/07 12:00	WPS WPS



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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn : Mr. Mike Altepeter Date Received: 08/13/07 15:55

Report Date: 08/16/07 Customer #: 201097 P.O. Number: 34339

Sample No: 07088200-5			Collect Date 08/10/07 14	:20
Client ID: OLD EIMCO DRUM FILTR	Site: STL		Locator:	<u> </u>
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		7.1	08/14/07 13:00	MEP
Leachate Preparation			08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation		•	08/15/07 08:00	JS
SW-846 6010 TCLP	•			
Arsenic, TCLP	. <	0.03 mg/l	08/15/07 11:49	WPS
Barium, TCLP	•	0,27 mg/l	08/15/07 11:49	WPS
Cadmium, TCLP		1 mg/i	08/15/07 11:49	WPS
Chromium, TCLP		0.035 mg/l	08/15/07 11:49	WPS
Lead, TCLP		0.086 mg/l	08/15/07 11:49	WPS
Selenium, TCLP		0.15 mg/l	08/15/07 11:49	WPS
Silver, TCLP	· <	0.003 mg/l	08/15/07 11:49	WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/15/07 12:00	WPS
Sample No: 07088200-6			Collect Date 08/10/07 14	:30
Client ID: 1ST STG.PURIFICATION	Site: STL		Locator: IN FRMT FI	RST STG TNK
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH		10.35	08/14/07 13:00	MEP
Leachate Preparation	• .	10.00	08/14/07 13:00	MEP
SW-846 3010A				
Sample Preparation			08/15/07 08:00	JS
SW-846 6010 TCLP				
	•	2 mg/l	08/15/07 11:52	WPS
Arsenic, TCLP Barium, TCLP	÷	0.13 mg/l	08/15/07 11:52	WPS
Cadmium, TCLP	<	0.004 mg/l	08/15/07 11:52	WPS
Chromium, TCLP	_	0.037 mg/l	08/15/07 11:52	WPS
Lead, TCLP	<	0.02 mg/l	08/15/07 11:52	WPS
Selenium, TCLP		0.19 mg/l	08/15/07 11:52	WPS
Silver, TCLP		0.0037 mg/l	08/15/07 11:52	WPS
SW-846 7470A R1.0			•	
Mercury, TCLP	· · · · · · · · · · · · · · · · · · ·	0.0002 mg/l	08/15/07 12:00	WPS
INICIOUS Y, JOLI.			**	



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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received: 08/13/07 15:55

Report Date: 08/16/07 Customer #: 201097 P.O. Number: 34339

Facility:

ACCREDITATIONS

NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100253.

Certified by: Sahaa G. Pandolfo, Project Manager

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3278 N. Highway 67 (Lindbergh) Florissant, MO 63033 PDC Laboratories, Inc. - St. Louis

www.pdciab.com www.environmetrics.net

CHAIN OF CUSTODY RECORD

Phone (314) 432-0550 or (314) 921-4488 Fax (314) 432-4977 or (314) 921-4494

State where samples collected.

(Instructions/Sample Acceptance Policy on Reverse)

ALL SHADED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

DITION YORN YORN YORN	PROPER BOTTLES RECIEVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME \$AMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) DATE AND TIME TAKEN FROM BAMPLE BOTTOM	15:30 TIME	4/13/01	LANLL	" Carlin	RECEIVED BY:	3/07 15:70 DATE TIME	W 8/1	RE S
	BAMPLE TEMPERATURE UPON RECEIPT CHILL PROCESS STARTED PRIOR TO RECEIPT RAMDI ESTS DEPENDEN ON ICE	(3:00)		1/8 1/8		RECEIVED BY	13.87 1300 NTE/ 1300	ISHED BY ISIGNATURE	
	6	10:07	S	7	12	(a>	1000		
LAB USE ONLY)	COMMENTS: (FOR LAB USE ONLY)	TIME	DATE	andergittinis (editional acceptor	Υ,	RECEIVED BY	TIME)
		-			(°	Mi	ERENT FROM ABO	RESULTS BY E-MAIL FAX PHONE CALL PHONE/FAX# IF DIFFERENT FROM ABOVE	RESL
	renge of $0.1-6.0^{\circ}$ C. By not initialing this area, you allow the lab to proceed with analytical testing regardless of the sample temperature.	a, you allow th	itialing this are	renge of 0.1-6.0°C. By not initialing this regardless of the sample temperature.	regardless of	Same Day	y)) 1-2 808. Days	NORMAL (8-10 808, Days) RUSH (5 808, Days) Fattrak (3 808, Days) DATE DUE	
est .	The sample temperature will be measured upon receipt at the lab. By initialing this area, you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the	upon receipt at ith analysis, if	be measured u	The sample temperature will be measured that the lab notify you, before proceeding w	The sample that the tab r	HARGE)	OVAL AND SURC	TURNAROUND TIME (RUSH TAT IS SUBJECT	•)
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(FOR LAB USE ONLY)	ANALYSIS REQUESTED:	3	IPPED	MEANS SHIPPED	MBER		PROJECT NUMBER	OF THE	$\overline{(-)}$



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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter Date Received :08/21/07 16:04

Report Date : 08/23/07 Customer # : 201097 P.O. Number : 34339

Sample No: 07088355-1			Collect Date 08/21/07 0	3:10
Client ID: CADMIUM FLOOR	Site: STL		Locator: BY STRAN	TIUM TANKS
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311		1.0		
Final pH Leachate Preparation		8.09	08/22/07 12:30 08/22/07 12:30	MEP,FM MEP,FM
SW-846 3010A				
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		0.056 mg/l	08/23/07 11:11	WPS
Arsenic, TCLP Spike Recovery Barium, TCLP		121 % Reco 0.27 mg/l	overv 08/23/07 11:11	WPS
Barium, TCLP Spike Recovery Cadmium, TCLP	<	103 % Recc 0.004 mg/l	overv 08/23/07 11:11	WPS
Cadmium, TCLP Spike Recovery	•	110 % Reco	* ,	
Chromium, TCLP	<	0.004 mg/l	08/23/07 11:11	WPS
Chromium, TCLP Spike Recovery Lead, TCLP		110 % Reco	overv 08/23/07 11:11	WPS
Lead, TCLP Spike Recovery Selenium, TCLP		110 % Reco	overv 08/23/07 11:11	WPS
Selenium, TCLP Spike Recovery		124 % Reco	overv	•
Silver, TCLP		0.0034 mg/i	08/23/07 11:11	WPS
Silver, TCLP Spike Recovery	•	109 % Reco	overv	
SW-846 7470A R1.0				
Mercury Spike Recovery Mercury, TCLP	<	115 % 0.0002 mg/l	08/23/07 11:20 08/23/07 11:20	WPS WPS



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Laboratory Results

Big River Zinc Rt. 3 & Monsanto Ave.

Sauget, IL 62201 Attn: Mr. Mike Altepeter

Mercury, TCLP

Date Received: 08/21/07 16:04

Report Date: 08/23/07 Customer #: 201097 P.O. Number: 34339

Facility:

ample No: 07088355-2		· · · · (Collect Date 08/21/07 08	:30
Client ID: FLR BY OLD EIMCO FTR	Site: STL		Locator:	
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311				
Final pH Leachate Preparation		5.24	08/22/07 12:30 08/22/07 12:30	MEP,FM MEP,FM
SW-846 3010A				
Sample Preparation		:	08/23/07 08:00	JS
SW-846 6010 TCLP	•	y di		
Arsenic, TCLP Barium, TCLP Cadmium, TCLP Chromium, TCLP Lead, TCLP Selenium, TCLP Silver, TCLP	< <	0.033 mg/l 1 mg/l 0.77 mg/l 0.17 mg/l 0.19 mg/l 0.02 mg/l 0.003 mg/l	08/23/07 11:22 08/23/07 11:22 08/23/07 11:22 08/23/07 11:22 08/23/07 11:22 08/23/07 11:22 08/23/07 11:22	WPS WPS WPS WPS WPS WPS
SW-846 7470A R1.0				
Mercury, TCLP	<	0.0002 mg/l	08/23/07 11:20	WPS
Sample No: 07088355-3	<u>,</u>	· · · · · · · · · · · · · · · · · · ·	Collect Date 08/21/07 09	:00
Client ID: FIRST STAGE FLOOR	Site: STL		Locator:	n lemnistre e spinatono am saligo income com come com come com come come com
Parameter	Qualifier	Result	Analysis Date	Analyst
SW-846 1311	* *			
Final pH Leachate Preparation		10.48	08/22/07 12:30 08/22/07 12:30	MEP,FM MEP,FM
SW-846 3010A			•	
Sample Preparation			08/23/07 08:00	JS
SW-846 6010 TCLP				
Arsenic, TCLP		0.33 mg/l	08/23/07 11:36	WPS
Barium, TCLP	V.	0.11 mg/l	08/23/07 11:36	WPS
Cadmium, TCLP	<	0.004 mg/l	08/23/07 11:36	WPS
Chromium, TCLP		0.031 mg/l	08/23/07 11:36	WPS
Lead, TCLP	< •	0.02 mg/l	08/23/07 11:36	WPS
Selenium, TCLP		0.14 mg/l	08/23/07 11:36	WPS
			08/23/07 11:36	

WPS

0.0002 mg/l

08/23/07 11:20

BIG RIVER ZINC CORPORATION

2401 MISSISSIPPI AVENUE SAUGET, ILLINOIS 62201-1078

TEL: 618-274-5000 FAX: 618-274-4444

Todd. C. Brown
United States Environmental Protection Agency
Region 5 LR-8J
77 West Jackson Boulevard
Chicago, Il 60604-3590

Re:

Pre- filing Notice and Opportunity to Confer

Big River Zinc Corporation EPA ID No: ILD 062444435

Dear Mr. Brown,

Big River Zinc chooses to confer with USEPA concerning the Administrative Complaint that USEPA intends to file.

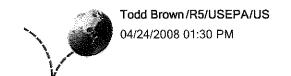
Please advise us as to the times and places available for the conference and those who will attend other than you. I have a previously scheduled trip to Finland the week of April 28th.

Please contact me at 618 274 5000 x 194 or maltepeter@bigriverzinc.com.

Sincerely

Michael A Altepeter

Environmental Manager/Senior Process Engineer.



To maltepeter@bigriverzinc.com

CC

bcc Karen Peaceman/R5/USEPA/US@EPA

Subject Conference Availability

Dear Mr. Altepeter:

This e-mail is in response to your letter regarding a request to confer with U.S. EPA on the proposed RCRA Complaint.

Your letter indicated that Big River Zinc would not be available the week of April 28th. At the moment, May 6th and May 8th appear to be the earliest dates EPA would be available. Please let me know if either of those dates are satisfactory, and what time of the day you would prefer to hold the conference. EPA could accommodate either a morning or afternoon meeting.

The meeting would be held at Region 5's office in downtown Chicago (77 W. Jackson Blvd., Chicago IL, 60604). Myself and Karen Peaceman, Attorney, Office of Regional Counsel, would be attending on behalf of U.S. EPA.

However, if you prefer, the meeting can be held via conference call.

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Land & Chemicals Division
RCRA Branch
(312) 886-6091
brown.todd@epa.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

APR 07 2008

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

George Obeldobel President Big River Zinc Corporation 2401 Mississippi Avenue Sauget, IL 62201

RE:

Pre-filing Notice and Opportunity to Confer

Big River Zinc Corporation EPA ID No.: ILD062444435

Dear Mr. Obeldobel:

This letter is to notify you that the United States Environmental Protection Agency (U.S. EPA) is prepared to file an administrative complaint for civil penalties against Big River Zinc Corporation. In addition, this letter informs you that U.S. EPA deems Big River Zinc Corporation to be a Significant Non-Complier. We are offering you an opportunity to confer with us in advance of our filing a complaint.

On September 19, 2007, the U.S. EPA conducted a hazardous waste inspection at your facility, Big River Zinc Corporation (Big River Zinc) located at 2401 Mississippi Avenue, Sauget, Illinois. Based on information collected during the inspection, U.S. EPA has determined that Big River Zinc violated certain requirements of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 et seq., as amended. These violations were previously identified in a Notice of Violation issued to Big River Zinc on January 17, 2008. Specifically, these violations include the following:

- 35 IAC § 703.121(a): Storage of Hazardous Waste without a Permit. At the time of the inspection, Big River Zinc was storing hazardous waste concrete and wood in two waste piles. Big River Zinc did not have a permit to store hazardous waste in waste piles, and generators storing hazardous waste without a permit must store their hazardous waste in containers, tanks, containment buildings or drip pads.
- 35 IAC § 724.152: Contingency Plan Content. At the time of the inspection, Big River Zinc's hazardous waste contingency plan did not include: a description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State

and local emergency response teams to coordinate emergency services; the addresses of the two persons listed as alternate emergency coordinators; and a brief outline of the capabilities of the emergency equipment listed in the plan.

• 35 IAC § 724.116(d)(3): Description of Training Program. At the time of the inspection, Big River Zinc did not have a document that provided a written description of the type and amount of both introductory and continuing training that will be given to each person filling an position related to hazardous waste management.

Based on the relevant liability and penalty information currently available to us, we have calculated a preliminary penalty of \$74,062 for the complaint. This potential penalty reflects our preliminary view of the gravity and duration of the violation, without regard to the "adjustment" factors discussed below and in the U.S. EPA's June 2003 RCRA Civil Penalty Policy (Penalty Policy). The final penalty we propose in the complaint may differ from this figure, based upon our consideration of any relevant new information you provide, and upon our further consideration of the Penalty Policy's adjustment factors.

This letter is not a demand to pay a penalty. We will not ask you to pay a penalty until we file the complaint or a final order. Before filing the complaint, we are giving you the opportunity to present any information that you believe we should consider regarding your liability for these violations and an appropriate penalty for them. You may present this information in writing or in a meeting with U.S. EPA representatives. Relevant information regarding liability might include evidence that you did not violate the law or evidence that we identified the wrong party.

You may also present information that you believe is relevant to the amount of our proposed penalty. Under RCRA we are required to consider the seriousness of the violation and any good faith efforts your company made to comply with the requirement violated. Factors relevant to the seriousness of the violation include, but are not limited to, the risks of exposure to hazardous wastes from the violation, the potential seriousness of contamination that could have resulted from the violation, the extent to which your company deviated from the requirement, and how many days the violation lasted. Factors relevant to good faith efforts your company made to comply could include evidence that you relied on compliance assistance from U.S. EPA or a state agency.

The Penalty Policy "adjustment factors" relevant to penalty include: (1) any good faith efforts your company made to comply with the requirement violated, (2) the expenses your company delayed or avoided by not complying with the requirement(s), (3) the degree to which the violation was willful, (4) whether your company has a prior history of not complying with RCRA, (5) financial inability to pay, and (6) other unique factors. Information relevant to good faith efforts to comply with the requirement may include, for example, records documenting actions the company took to comply prior to the time that U.S. EPA or another governmental agency first discovered the violations in this case.

Additionally, if your company notifies us that it may be financially unable to pay a penalty of \$74,062 or greater, we will consider its ability to pay prior to finalizing our penalty proposal and

filing a complaint, provided that you submit to us required financial documentation to support such a claim. Accordingly, if you believe that your company may be financially unable to pay a \$74,062 or greater penalty, please provide us certified financial statements, including balance sheets, and copies of your company's signed income tax returns with all schedules, for the past three years. We will not consider an "ability to pay" claim without such financial information.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If you fail to assert a business confidentiality claim, U.S. EPA may make all submitted information available, without further notice, to any member of the public who requests it.

If you choose to respond to this letter or to confer with us, you should contact Todd C. Brown, of the RCRA Branch, in writing within seven 10 business days of your receipt of this Notice. Please be advised that this conference is not a settlement negotiation covered by Federal Rule of Evidence 408; we may use any information you submit in support of an administrative, civil or criminal action. At the conclusion of the conference or thereafter (or after you have completed a written reply if you do not wish to have a conference), we may give you the opportunity to engage in settlement negotiations before we file the complaint. In the event that pre-filing settlement negotiations commence and are successful, a settlement agreement can be filed simultaneously with the complaint, under Agency regulations at 40 CFR § 22.13(b).

If you decide not to respond to this letter or to confer with us, U. S. EPA may proceed with the enforcement action against Big River Zinc as authorized under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), including the assessment of appropriate civil penalties.

A copy of the document "U.S. EPA Small Business Resources" is enclosed for your reference. If you have any technical questions regarding the alleged violations, please contact Mr. Brown at (312) 886-6091. You should direct legal inquiries to Karen Peaceman, Assistant Regional Counsel, at (312) 353-5751.

Sincerely,

Willie H. Harris, P.E.

Chief, RCRA Branch

Land and Chemicals Division

cc: Todd Marvel, Illinois Environmental Protection Agency

Enclosure

Office of Enforcement and Compliance Assurance

INFORMATION SHEET

U. S. EPA Small Business Resources

f you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines, websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Compliance Assistance Centers

(www.assistancecenters.net)

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

Agriculture

(www.epa.gov/agriculture or 1-888-663-2155)

Automotive Recycling Industry (www.ecarcenter.org)

Automotive Service and Repair (www.ccar-greenlink.org or 1-888-GRN-LINK)

Chemical Industry (www.chemalliance.org)

Construction Industry (www.cicacenter.org or 1-734-995-4911)

Education (www.campuserc.org)

Healthcare Industry (www.hercenter.org or 1-734-995-4911)

Metal Finishing (www.nmfrc.org or 1-734-995-4911)

Paints and Coatings (www.paintcenter.org or 1-734-995-4911)

Printed Wiring Board Manufacturing (www.pwbrc.org or 1-734-995-4911)

Printing (www.pneac.org or 1-888-USPNEAC)

Transportation Industry (www.transource.org)

Tribal Governments and Indian Country (www.epa.gov/tribal/compliance or 202–564-2516)

US Border Environmental Issues (www.bordercenter.org or 1-734-995-4911)

The Centers also provide State Resource Locators (www.envcap.org/statetools/index.cfm) for a wide range of topics to help you find important environmental compliance information specific to your state.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page www.epa.gov

Small Business Gateway www.epa.gov/smallbusiness

Compliance Assistance Home Page www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance www.epa.gov/compliance

Voluntary Partnership Programs www.epa.gov/partners

Office of Enforcement and Compliance Assurance: http://www.epa.gov/compliance



U.S. EPA SMALL BUSINESS RESOURCES

Hotlines, Helplines & Clearinghouses

(www.epa.gov/epahome/hotline.htm)

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. A few examples are listed below:

Clean Air Technology Center (www.epa.gov/ttn/catc or 1-919-541-0800)

Emergency Planning and Community Right-To-Know Act (www.epa.gov/superfund/resources/infocenter/epcra.htm or 1-800-424-9346)

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information. (www.epa.gov/sbo or 1-800-368-5888)

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers (www.epa.gov/clearinghouse)

National Response Center to report oil and hazardous substance spills. (www.nrc.uscg.mil or 1-800-424-8802)

Pollution Prevention Information Clearinghouse (www.epa.gov/opptintr/ppic or 1-202-566-0799)

Safe Drinking Water Hotline (www.epa.gov/safewater/hotline/index.html or 1-800-426-4791)

Stratospheric Ozone Refrigerants Information (www.epa.gov/ozone or 1-800-296-1996)

Toxics Assistance Information Service also includes asbestos inquiries. (1-202-554-1404)

Wetlands Helpline

(www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or the following two resources:

EPA's Small Business Ombudsman (www.epa.gov/sbo or 1-800-368-5888)

Small Business Environmental Homepage (www.smallbiz-enviroweb.org or 1-724-452-4722)

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated,

businesses may be eligible for penalty waivers or reduction EPA has two policies that potentially apply to small businesses:

The Small Business Compliance Policy (www.epa.gov/compliance/incentives/smallbusiness)

Audit Policy

(www.epa.gov/compliance/incentives/auditing)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an SBA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees, or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.



Land and Chemicals Division

Type of Document	
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	erm	ina	fion	Ot	Order
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□ Notice of Violation and Inspection Report/Checklist

□ No Violation Letter and Inspection Report/Checklist

□ Letter of Acknowledgment

□ Information Request

Pre-Filing Notice and Opportunity to Confer

☐ State Notification of Enforcement Action

□ Other Correspondence

active Plante Dig 101 of 21110 Corporatio	er Zinc Corporation
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Facility Location: 2401 Mississippi Avenue

City: Sauget

State: Illinois

U.S. EPA ID#: ILD062444435

Assigned Staff: Todd Brown

Phone: (312)886-6091

Name	Signature	Date
Author	Jald Brown	3/17/08
CS1 Section Chief	- Underhan	3/18/08
Regional Counsel	Karen fleaceman	3/20/08
RCRA Branch Chief	Wille & Alaris	4/4/08



Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

- 1. Date stamp the cover letter;
- 2. Make four copies of the contents of this folder:

One copy for the assigned staff;

One copy for the section file;

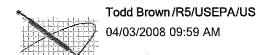
One copy for the branch file; and

One copy for the official file copy.

- 3. Make any additional copies for cc=s or bcc=s.
- 4. Mail the original certified mail and distribute office copies and cc=s and bcc=s.

Once the certified mail receipt is returned:

- 5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
- 6. E-mail staff the date that the letter was received by facility.



- To Dennis.McMurray@illinois.gov, Todd.Marvel@illinois.gov, William.Ingersoll@illinois.gov, Paul.Purseglove@illinois.gov
- cc Mary Setnicar/R5/USEPA/US@EPA

bcc

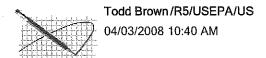
Subject Enforcement Action Communication- Big River Zinc

This is to inform you that on April 4, 2008, U.S. EPA will send by certified mail, the attached Pre-filing and Opportunity to Confer notice to Big River Zinc Corporation, Sauget, IL. The alledged violations were found during U.S. EPA's September 19, 2007 compliance evaluation inspection of Big River Zinc Corporation.

Contact: Todd Brown, (312) 886-6091



BRZ OPTC.doc



To Dennis.McMurray@illinois.gov, Todd.Marvel@illinois.gov, William.Ingersoll@illinois.gov, Paul.Purseglove@illinois.gov

cc Mary Setnicar/R5/USEPA/US@EPA

bcc

Subject Enforcement Action Communication- Big River Zinc

Correction. The letter will be issued on April 7.

This is to inform you that on April 4, 2008, U.S. EPA will send by certified mail, the attached Pre-filing and Opportunity to Confer notice to Big River Zinc Corporation, Sauget, IL. The alledged violations were found during U.S. EPA's September 19, 2007 compliance evaluation inspection of Big River Zinc Corporation.

Contact: Todd Brown, (312) 886-6091



BIG RIVER ZINC CORPORATION

2401 MISSISSIPPI AVENUE SAUGET, ILLINOIS 62201-1078

TEL: 618-274-5000 FAX: 618-274-4444

> Mr. Todd Brown U. S. EPA Region 5 77 West Jackson Boulevard, LR-8J Chicago, Illinois 60604

Mr. Brown

Please consider the attached documents as part of the response to the January 17, 2007 Notice of Violation received by Big River Zinc. In our letter of February 13, BRZ stated that the Contingency plan and the Training program would be revised and copies sent to EPA by March 31, 2008.

Please find included with this letter a copy of the former and revised Contingency plans. Areas of concern are highlighted in yellow in the former plan and clarifications in grey in the revised plan. The Revised contingency plan will be mailed by certified mail to the Sauget Police Department, The Sauget Fire Department, memorial Hospital, and the Local Emergency Planning Committee. The former plan was mailed in the same way and the certified mail cards are on record. In addition, each agency will be called personally.

The clarified training document is also included. BRZ is shut down and there is no workforce at present. When BRZ re starts, or if employees are recalled for short periods and will handle Hazardous Waste, the new training document and the revised contingency plan will be used for training.

Those individuals who have received training in Hazardous Waste Management and Hazardous Waste Transportation (whose certificates of completion were sent to you) will continue to receive that training annually.

Sincerely,

Michael A Altepeter

Environmental manager/Senior Process Engineer

BIG RIVER ZINC

HAZARDOUS WASTE (RCRA) TRAINING

TRAINING DOCUMENT

Big River Zinc generates more than 1000 Kg (2250lb.) of hazardous Waste per year. Therefore BRZ is classified as a large Quantity Generator. BRZ is required to conduct introductory and annual training. This is both the introductory and refresher training.

Who must be trained? (Why you are in this class)

You are here because you perform one or more of the following:

- Decide which waste is hazardous
- Add hazardous waste to accumulation containers at accumulation points
- Remove hazardous waste from accumulation containers
- Transport hazardous waste to or from accumulation points
- Respond to spills, fires, other emergencies involving hazardous waste
- Complete hazardous waste manifests or annual reports
- Inspect hazardous waste accumulation points
- Operate or work at accumulation points
- Conduct any tasks involving occupational exposure to, or which require management of, hazardous waste

Question: What do you do that involves Hazardous Waste?

Training frequency:

• Any employee of Big River Zinc who requires Hazardous Waste Training will be trained when they transfer to a job that fits the description above and once every calendar year they remain in a position that fits the description above.

Instructors

Hazardous waste instructors must be trained outside the plant in Hazardous Waste Management, and/or Hazwopper. The Instructor must have a certificate that indicates the Training is in accordance with 40 CFR 265.16, name of the school sponsoring the training and signature of the instructor.

Characterization and Identification

Hazardous waste must be:

- 1. Solid Waste
- 2. Be specified as a listed Hazardous waste by EPA

3. Be characterized as Hazardous At BRZ this normally means it failed the TCLP test.

Question: Does anyone know what a TCLP test is or who does the TCLP test?

Time Limits

BRZ is a large quantity generator. Hazardous waste cannot remain at BRZ for more than 90 days from the time it becomes waste and is deposited in the accumulation container.

Satellite accumulation points

- BRZ has satellite accumulation areas. They are:
 - 1. A steel drum for contaminated oil dry in the vehicle shop
 - 2. A steel drum for contaminated oil dry in the oil house
 - 3. A steel drum for contaminated oil dry by the fueling station
 - 4. A steel drum for contaminated parts cleaning station in the vehicle shop
- These are under the control of the operator in the area.
- The steel drums are compatible with the waste, that is, the waste will not corrode the container.
- The drums must be in good condition. They are regularly inspected, but if you see dents or leaks report the problem immediately.
- The containers are marked as Hazardous waste satellite accumulation containers. The label also says why it is hazardous waste.
- The drums must be sealed except when they are being filled.
- These satellite accumulation points have no time limit, BUT when the drum is full it must be shipped as hazardous waste within 90 days.

Question: What are you to do with used oil dry?

Question: What do you do if you open the drum at the oil house to put used oil dry in it and you find the drum is full?

Ouestion: Why are the drums for parts cleaner and oil dry have special markings.

Question: Why do the drums have to be sealed all the time?

Accumulation Point

BRZ also has accumulation points for larger quantities of hazardous waste. Examples are press cloth, and construction debris.

Hazardous waste will be stored in either SPECIAL Hazardous waste dumpsters or loaded from the point of origin directly into SPECIAL Hazardous Waste Dump Trucks. HAZARDOUS WASTE CAN ONLY BE DEPOSITIED IN SPECIALLY DESIGNATED DUMPSTERS OR TRUCKS. Regular trucks or dumpsters cannot be used for hazardous waste. Regular dumpsters for ordinary

- trash are marked. These containers cannot leave BRZ unless the area superintendent certifies to security that they do not contain any Hazardous waste.
- The containers for hazardous waste must be specially marked. At BRZ the marking includes:
 - 1. HAZARDOUS WASTE
 - 2. Date the first waste was deposited into the container
 - 3. The last date the container must be shipped as hazardous waste
 - 4. Identification of the hazardous waste that can be placed into that particular container.
 - 5. If the Safety Department determines the waste is Flammable the container will be marked as such.
- All Dumpsters and trucks for hazardous waste must inspected upon arrival and be in good condition. They must remain in good condition. The container must be compatible with the waste. For example acid soaked absorbent pillows cannot go into a steel dumpster.
- They must be covered when not being filled. No waste can be outside the container.
- Containers must be handled in such a way that they do not rupture or leak. For example do not puncture a dumpster with a fork truck. No cutting torches, welders, gasoline, or diesel can be used or stored by a Hazardous waste container.
- Inspection
 - 1. All Hazardous waste sites and satellite containers will be inspected once a week by security, BUT if you see something out of place near a container report it. DON"T wait for someone else to do it.
 - 2. At BRZ all other waste containers will be inspected weekly to ensure no hazardous waste was placed in them. If you have any doubts also what may be hazardous waste ask your supervisor, Safety, or Environmental Manager. Do not throw plant waste into a regular trash dumpster without asking.
 - 3. At BRZ there are construction projects.
 - -The contractors may use dumpsters and so on for waste. These must be labeled as belonging to the contractor. Each waste container MUST be marked as either Hazardous waste or regular construction waste.
 - -If hazardous waste is generated, the hazardous waste must go into SPECIAL HAZARDOUS WASTE CONTAINERS. Hazardous waste containers will be marked manifested and shipped in accordance with regulations.
 - -Regular waste can go into other containers: dumpsters, trucks, drums, or stored in piles. Any construction waste container or piled non hazardous waste is under the control of the Project Engineer. No waste container or truck connected with a project can leave the plant without the written approval of the Project Engineer, who certifies that the container has no hazardous waste.

3/27/2008

Transport and manifesting, Land disposal restrictions, record keeping

These functions are not covered in this class. The Environmental manager, the Security Supervisor, The Senior Security officer, and the Safety Director will receive training outside the plant to perform these functions.

Question: If you have to dispose of used press cloth, what would you do?

Question: What do you do with a clean up from the Cell House basement?

Question: You have just finished installing new pipe. The old pipe is coated with

sulfate. What do you do with it?

Question: You notice the tarp has come loose from the press cloth dumpster. What

shall you do?

Question: A contractor is at the gate with a dumpster of trash. You are the security

officer. What do you do?

Hazardous Waste Emergency Procedures

Note: It is BRZ policy that employees are not permitted to respond to uncontrolled releases of hazardous material or, likely uncontrolled releases, or place themselves in danger during a major uncontrolled emergency situation such as a large fire, an explosion or series of explosions, or life threatening major spill or fume release.

The only releases that BRZ employees are allowed to respond to are those that are incidental where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel.

In the event of an uncontrolled release or release that is likely to become uncontrolled, use the evacuation procedure.

At BRZ, uncontrolled releases are not likely to result from hazardous waste. So use the following procedures unless personal safety is threatened as described in the preceding 3 paragraphs.

If you see a dangerous situation involving the area around hazardous waste containers or involving the Hazardous waste itself

- 1. Contact Security and your supervisor using the regular phone, a walkie talkie, or a cell phone, or go to the Security building. Security will contact the Emergency coordinator. The supervisor on duty will determine if the workers on site can handle the emergency or if outside help is needed. If personnel on site cannot handle the problem <u>BECAUSE IT IS AN UNCONTROLLED RELEASE OR IS LIKELY TO BECOME AN UNCONTROLLED RELEASE</u>, the supervisor will have Security contact the Fire Department or other emergency help as shown in the Contingency plan. Upon arrival, the Emergency Coordinator will assume control.
- 2. If the supervisor determines on site personnel can handle the problem safely, the supervisor will have workers don the needed protective gear and then commence operations.

- 3. Fire Use the fire extinguishers or fire hoses to put out the fire. All Personnel are trained by Safety to use this equipment.
- 4. Spill Use the absorbent pillows and mats contained in the spill kits located around the plant to prevent liquids from reaching the sewers or bare ground.
- 5. Clean up All materials from a fire or spill and all absorbent materials as well as PPE will be bagged and tagged and placed in suitable Containers designated by the Emergency Coordinator until Suitable hazardous waste containers can be procures if needed. Sweeping using absorbent materials or vacuuming with HEPA filtration is preferred to prevent dusting of hazardous substances. Safety trains all personnel to use PPE properly.
- 6. Leaks to sewer or unpaved ground.
 - -- If any Hazardous waste leaks to a sewer, American Bottoms must be contacted immediately by the supervisor or Emergency Coordinator. American Bottoms will have to adjust their treatment system to remove the hazardous contaminants. Vacuum trucks will be used to clean the sewer if possible.
 - -- If any liquid hazardous waste leaks to unpaved ground, the unpaved spot where the leak entered will be dug up with earthmoving equipment kept on site until there is no visible sign of the waste. The ground will be tested to determine if all the contaminants have been removed.
- 7. Automatic Shut Off, automatic alarms All hazardous waste at BRZ is handled by personnel directly. Therefore, there are no automatic shut offs, no automatic alarms.
- 8. Shutdown of operations Operations may be shut down or curtailed if an emergency condition involving Hazardous waste either endangers personnel or if operating personnel are needed to remedy the emergency condition.

Question: If you saw that some empty cardboard boxes were piled against a hazardous waste dumpster, what would you do?

Question: If someone hit the solvent drum used for parts cleaning with a fork truck and it begins to leak what should you do?

Question: Who is in charge during an emergency situation involving hazardous waste? Question: Will operations ever be shut down because of a fire near a hazardous waste container?

Ouestion: When do you learn to use a fire extinguisher?

Training Documentation and records

Copies of all training documents will be kept in the Environmental manager's files and in Safety dept files, and on the Server. Please refer to the RCRA training document for a detailed description on training. As a minimum the program will document:

1. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

3/27/2008

2. A written job description for each position described above.

- 3. A written description of the type and amount (RCRA Training Document) of both introductory and continuing training that will be given to each person described above.
- 4. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

Special BRZ Procedures.

Employees must comply with all procedures set forth in the memos in the Consolidated Waste Procedures and Records. These concern BRZ specifically.

This training also includes a tour of the Hazardous Waste Areas at BRZ.

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Big River Zinc 2401 Mississippi Avenue Sauget, IL 62201

To: All Employees

From: Environmental Manager

Date: May 27, 2005

Please lend your attention to the following matters because we are obligated by law through the Environmental Protection Agency to handle Hazardous Waste in a responsible manner.

Waste OIL

At this site, any spills of petroleum products or wastes like lubricating oils, motor oils, transmission fluid, gasoline, or diesel fuel may be Hazardous Waste because of possible contamination with metals. All these spills must be contained and cleaned up immediately. The cleaned up material including an adsorbent material will be tested to determine proper disposal method. The spill and cleanup must be reported to a supervisor and through the supervisor to the Environmental Manager. The spill must be kept from reaching any sewer. Whatever material was used to soak up the waste, for example oil dry, sawdust, concentrate, calcine, ZSM, residue, sweeping compound, etc. cannot be thrown away in the regular trash. The oil houses and the vehicle shop have satellite accumulation points. They are labeled yellow plastic drums. Use these to contain used oil dry. The Environmental manager will decide the best disposal method for these materials based on characteristic testing.

Oil Spills

If any petroleum products or waste oil spills reaches a sewer in any part of the plant, the incident must be reported to your supervisor. Supervisors are to use all safe methods to stop the leak and do whatever they can to keep the material out of the sewer first. Please report the spill to the Environmental manager and/or American Bottoms treatment plant as soon as possible. If you are needed at the spill site, call Security on your radio and have Security report the spill. Whenever there is any sort of leak, please look around and find out if anything reached the sewer.

Security has the phone number of the American Bottoms Treatment Plant. If a spill is reported to the American Bottoms treatment plant, the Environmental Manager must also be notified at 194 or on his Cell Phone.

Regulated material spills

Any Cell Acid, Purified solution, ZSM, Arsenic, Copper Sulfate, Hydrochloric Acid, Caustic, Sulfuric Acid, Lime, Ammonium Chloride, Strontium carbonate, Copper cake, Cadmium sponge, spills must be reported to your supervisor. Supervisors are to use all safe methods to stop the leak and do whatever they can to keep the material out of the sewer first. Please report the spill to the Environmental manager and/or American Bottoms treatment plant as soon as possible. If you are needed at the spill site, call Security on your radio and have Security report the spill. Whenever there is any sort of leak, please look

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around and find out if anything reached the sewer. Security has the phone number of the American Bottoms Treatment Plant. If a spill is reported to the American Bottoms treatment plant, the Environmental Manager must also be notified at 194 or on his Cell Phone.

Non hazardous Trash Containers

Any Cell Acid, Purified solution, ZSM, Arsenic, Copper Sulfate, Hydrochloric Acid, Caustic, Sulfuric Acid, Lime, Ammonium Chloride, Strontium carbonate, Copper cake, cadmium sponge, concentrate, residue, calcine, Zinc nuggets, cathodes, Zinc dust and so on CANNOT be thrown into a trash dumpster. Any petroleum products or wastes like lubricating oils, motor oils, transmission fluid, gasoline, diesel fuel and the like CANNOT be thrown into a trash dumpster. These are trash dumpsters NOT hazardous waste containers. It is a violation of the law to put anything but normal trash in the trash dumpsters.

Thank you for all your efforts.

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Big River Zinc

2401 Mississippi Avenue

Sauget, IL 62201

Management of Waste Especially for Construction and Maintenance Projects

- 1. No Hazardous Waste may ever leave this facility without proper testing and manifests in accord with EPA regulations.
- The Waste from any project at Big River Zinc that results in the accumulation of materials such as; soil, steel, fiberglass, petroleum products and residues, siding, bolts, rags, wood, brick, rubber liners, cardboard, pavement, etc will fall under this management procedure.
- 3. Inasmuch as possible, determine if the waste the project will produce is hazardous before the project begins so proper arrangements can be made for both holding the material on site and disposal of the material in accordance with EPA regulations. Please contact the Environmental Manager for aid in determining if the waste materials from your project are hazardous.
- 4. Non hazardous waste such as packaging for new parts, banding, pallets, and so on can be disposed of in the regular trash, however these wastes cannot be contaminated with process materials (concentrate, sulfates, slimes and so on.)
- 5. Scrap metal sold to a metal recycler is exempt from hazardous waste. However the metal must be cleaned of gross accumulations of sulfate, acid, residue, manganese slimes, calcine, etc before leaving a production area.
- 6. If testing (or generator knowledge) indicates waste products from a project are hazardous, a proper hazardous waste receptacle will be ordered to store the material during the life of the project. (Note; the hazardous waste cannot be held at BRZ more than 90 days). These receptacles (usually dumpsters, but barrels, etc are used at times) must be positioned so they cannot leak to the sewer system. The Environmental manager must approve placement of the receptacles (dumpsters and barrels).
- 7. When the hazardous container arrives it will be properly labeled with the accumulation date. It will be added to the rounds for weekly inspection.

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- 8. Material such as soil, concrete, asphalt that prove to be hazardous waste but can be shipped by dump truck can be piled in an area approved by the Environmental Manager until they can be loaded for shipment. The pile must be cordoned off and labeled.
- 9. Some materials, which are not part of normal cleanup and reprocessing within the BRZ production system, can be recycled through the process to recover heat, metals, etc. An example is wood. It must be assumed that if they have enough value to BRZ that they are to be recycled they would be hazardous waste if they leave the plant. If a dumpster is the most convenient way to handle the material, then a hazardous waste dumpster must be used for the purpose. If the material is accumulated in a pile to be transferred with BRZ equipment, then the Environmental Manager must approve the area of accumulation.
- 10. Any third party dumpster or container used in this plant must be labeled. If it may contain hazardous waste, but testing is not complete, it must be labeled "Possible Hazardous Waste Testing results due _____ DO NOT REMOVE without written approval of Name." Where name is Supervisor or Engineer in charge of project.

EXCEPTION: In Fall 2007 the demolition of the Leach Building commenced. The contractor for this is Spiritas Wrecking. Spiritas supplies their own vehicles for disposal of Non Hazardous Waste and for metal recycling. There will be a special sign out sheet for Spiritas. The driver of each container or truck belonging to Spiritas that leaves the plant will sign a sheet for Spiritas that the material is Non Hazardous. The Supervisor will sign the same sheet Daily verifying that Spisitas did not haul any hazardous Waste out of BRZ. These Trucks and Dumpstaers will not be labeled as they belong to and are under the exclusive control of Spiritas. No other party will be allowed to use their dumpsters or vehicles.

- 11. If the container is not for Hazardous Waste, then it must be labeled. "NOT FOR HAZARDOUS WASTE DO NOT REMOVE WITHOUT WRITTEN APPROVAL OF Name." Where name is the Chief of Security. The Chief of Security will obtain verification that the material in the container is Non Hazardous Waste from the Area Manager or Project Engineer before allowing the dumpster to leave the plant.
- 12. Any of the labels described above must be displayed on the container (dumpster) so Security can see them easily. Security is to stop any container with such a label if they have no written approval for it to leave the plant, and call the Environmental manager or Plant manager.
- 13. Security personnel will be trained to inspect the hazardous waste dumpsters, the regular trash dumpsters, and used oil collection points weekly.
- 14. Whenever a load of waste material (trash) leaves the plant, security personnel will inspect the contents. If there is material in the load, which does not appear to be normal trash, and there is no Hazardous Waste Manifest for that particular load, the truck will not be allowed to leave BRZ property until the Environmental Manager has been contacted and has made a determination of the proper course of action.

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Instructions for Hazardous Waste Shipments

- 1. Upon determination of the need for a hazardous waste shipment.
 - 1.1. Determine whether there is a current profile for the hazardous waste
 - 1.1.1. If there is one available for this shipment use it
 - 1.1.2. If not send a sample of the waste to an EPA certified lab, and have the sample analyzed, usually a full TCLP analysis plus ph analysis. (If dealing with Clean management, Kevin Baker, or Heritage, Fred Davidson, they will have the waste tested and provide the profile (usually at no cost)).
 - 1.1.3. Contact broker or agency who will receive waste: [Currently Clean Management phone: (800) 538 8131)
 - 1.1.4. Obtain Hazardous Waste Manifest from broker or receiving company
- 2. Upon arrival of transport, weigh truck
- 3. Upon departure of truck:
 - 3.1. In coordination with driver weigh truck, make certain it is within DOT weight limits, that all the tarps lids, etc are secured properly, that the truck and container are clean and free of debris, mud, etc. and then fill out hazardous waste manifest.
 - 3.2. BRZ releaser print name and sign in block 15.
 - 3.3. Have driver fill in name and sign, block 17.
- 4. Make twp copies of the land disposal and restriction form for that waste stream and attaché one to the Generator retain copy, page 6 last page; and the other to the rest of the copies that the driver takes with the load.
- 5. Hold file in working folder until receipt of copy from TSD showing receipt of shipment and certificate of disposal. If these are not received within 30 days contact the disposal site to get a copy. If one doesn't come contact EPA.
- 6. Hazardous Waste containers and consolidation areas must be labeled with signs, and inspected weekly by security.
- 7. Make out HAZARDOUS WASTE sticker showing start date for 90-day clock and place it onto the new container.
- 8. Log the shipment into the excel spread sheet for Hazardous Waste Shipments kept on the server under "Environmental Topics"

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Attachment A:

Disposition of Hazardous Waste Manifest Copies For State of Michigan Manifests

- Copy 1: Goes with the Driver and is forwarded to the destination State by the Disposal facility.
- Copy 2: Goes with Driver and is forwarded to the generator State by the Disposal facility
- Copy 3: Goes with the driver and is returned to the Generator to verify receipt of shipment by the Disposal facility.
- Copy 4: Goes with the Driver and is the Disposal facility's retain copy.
- Copy 5: Goes with the driver and is retained by the Transpost company.
- Copy 6: BRZ Copy that remains here.

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION SAUGET, ILLINOIS

Revised September 21, 2005

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1.0

INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

2.0

DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container, which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0.

EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The primary or the alternate Emergency Coordinators will decide which portions of this ERP are to be implemented following an evaluation of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC will determine if the emergency presents an actual or possible threat to human health and the environment, or if Big River Zinc personnel can control the situation.

Some types of emergencies that require full implementation of the ERP include:

- · A fire that could spread off site;
- · A fire that is too large to extinguish with a portable fire extinguisher;
- A spill or release of hazardous material that results in airborne constituents; and
- · Uncontainable runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

Personnel

Upon discovering a situation that may represent an emergency, plant personnel will:

- a. Report the situation to a supervisor immediately or call security if the supervisor cannot be found immediately; and
- b. Verbally warn other personnel if the situation is an immediate threat to their safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

a. Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator or alternate.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:
 - Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion that could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.
 - Notify security to call for police and/or fire department. The police or fire departments have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.
- Commit and direct activities of any and all resources available that are necessary to carry out the ERP.
 The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures, which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security

Ext. 110 (Internal Plant Phone) (618) 274-5000 ext. 110 (Outside Phone) Plant Radio

Primary Emergency Coordinator

Mike Altepeter (618) 274-5000 Ext. 194 (office)

(314) 846-8093 (Home) (618) 410-8021 (cell)

Home Address 2936 Point Drive St. Louis, MO 63129

Alternate Emergency Coordinator

Anthony Thomas (618) 274-5000 Ext. 198 (office)

(618) 410-8020 (cell)

Second Alternate Emergency Coordinator

Steve Ash (618 0 274 5000 ext 243 (office)

(618) 410 4703 (cell)

Federal National Response Center (800) 424-8802

(Release of Hazardous Substances)

USEPA Region V (312) 353-2000

State Illinois Emergency Management Agency (800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance 911

Local Emergency Planning Committee (LEPC) (618) 277-3012

Mr. Don Feher

Local Emergency Planning Committee

321 W. "F" Street

Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency

Attn. Mr. Don Schneider 4500 Memorial Drive Belleville, IL 62226 (618) 257-5840

Contractor Support

Heritage Environmental

(800) 388-3500

Attn: Mr. Dan Hans 1188 Pershall Road

Bellfountaine, MO 63137

Onyx Industrial Services

(618) 931 0010

Fred Davidson

121 East Chain of Rocks Road

Mitchell IL 62040

Bellon Environmental Company

(314) 890 8600

Bob Goodman

600 Fairview

St. Louis, MO 63132

Big River Zinc has discussed the contents of this plan, and has provided a copy of the plant location to the Sauget Fire and Police Departments, the LEPC, Heritage Environmental and Memorial Hospital.

3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated. The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.
- Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process
 and/or operations that may interfere with the emergency response actions;
- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- · Notify all unauthorized personnel to vacate the area per evacuation plans; and
- · Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by observation and review of facility records, manifests, and, if necessary, by chemical analysis; and

Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will
assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center (800-424-8802) and the Illinois Emergency Management Agency (800-782-7860). This verbal report includes:

- Name, address, and telephone number of the reporter;
- Name and address of the facility;
- Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;
- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s)
 (MSDS). Use MSDS information to guide response and determine personal protective equipment
 (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize
 the spilled material;
- · Alert local authorities if material may reach outside facility property;
- · Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- Take measures to contain the spill;
- · Direct cleanup so that all hazardous materials are placed in properly labeled containers;

- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

4.0

RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment <u>outside the facility</u>, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. 'F' Street Belleville, IL 62220-1193	(618) 277-3012

Contractor Support:

Heritage Environmental (800) 377-2440 Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137

Or

Onyx Industrial Services (618) 931 0010 Fred Davidson

121 East Chain-of-Rocks Road

Mitchell, IL 62040

5.0 POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- · Name, address, and telephone number of the facility;
- USEPA identification number for the site;
- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;

- · Assessment of any actual or potential hazards to human health or the environment;
- · Procedures followed to reduce and remove released materials;
- · Estimated quantity and disposition of the recovered material that resulted from the incident;
- · Corrective measures taken;
- Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

6.0 EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	<u>Description</u>	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gatehouse. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios that are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
	Two-way radio communications with the police and fire departments of Sauget is available to security.	
	A weather monitor is available 24-hours per day in case of a weather emergency.	
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Cell Phones	There are 19 Cell Phones issued to Key company management personnel. These can be used to contact people needed while outside or inside the plant. The cell phones can be used as normal phone or "walkie talkie" mode.	The cell phones are in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the Security Office for needed information by using the telephone communications. However, emergency communications would generally be handled through the two-way radios and Cell Phones for faster response time.	NA

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The department supervisors inspect the extinguishers on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis. Fire extinguisher training is held annually for all employees. No employees are trained when hired.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy-duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the storeroom.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

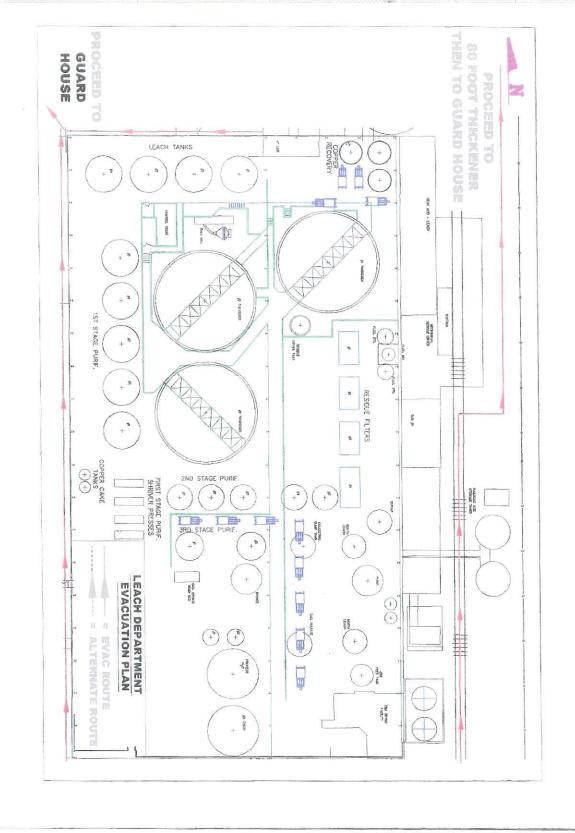
7.0 Training

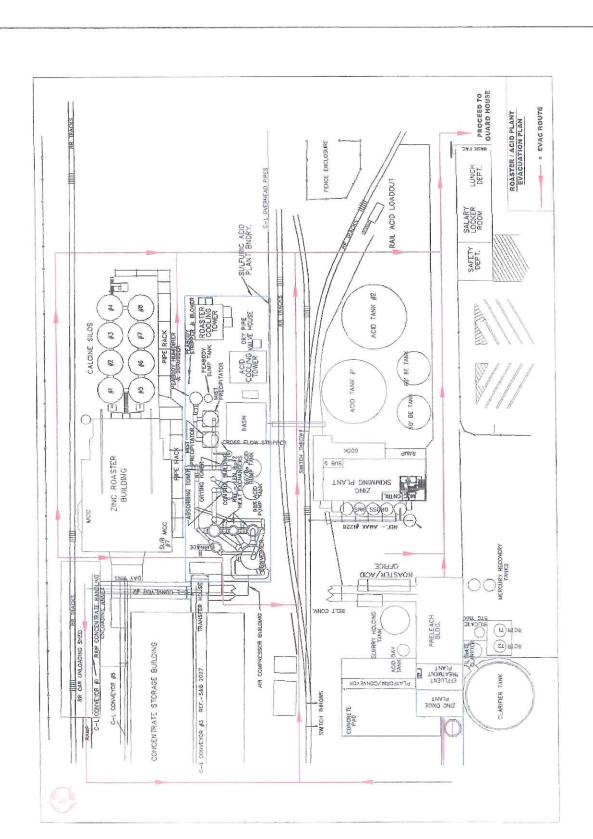
The details of the training program for personnel involved in contingencies involving hazardous waste will be kept in the Safety department. Copies of the training will also be kept in the Environmental manager's files. As a minimum the program will document:

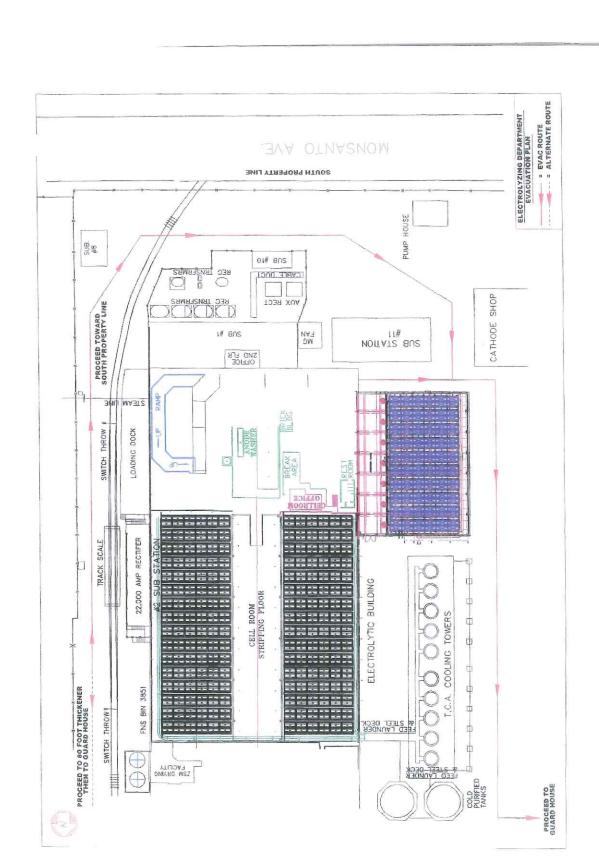
- a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
- b. A written job description for each position described above.
- c. A written description of the type and amount of both introductory and continuing training that will be given to each person described above.
- d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

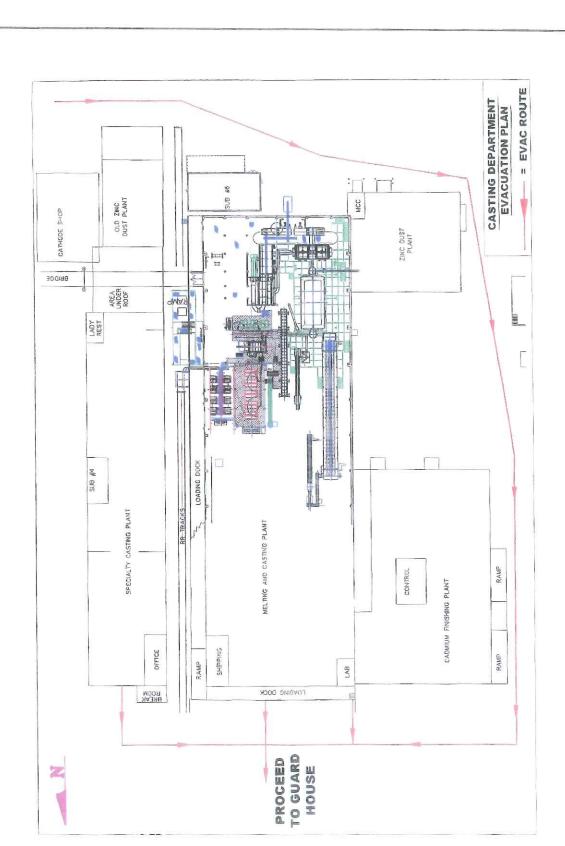
APPENDIXA

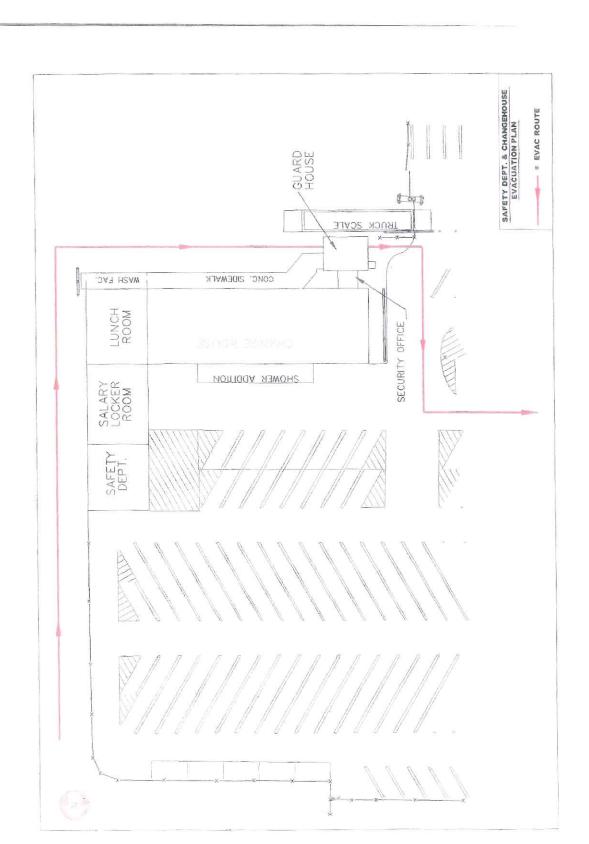
FACILITY SITE DIAGRAMS

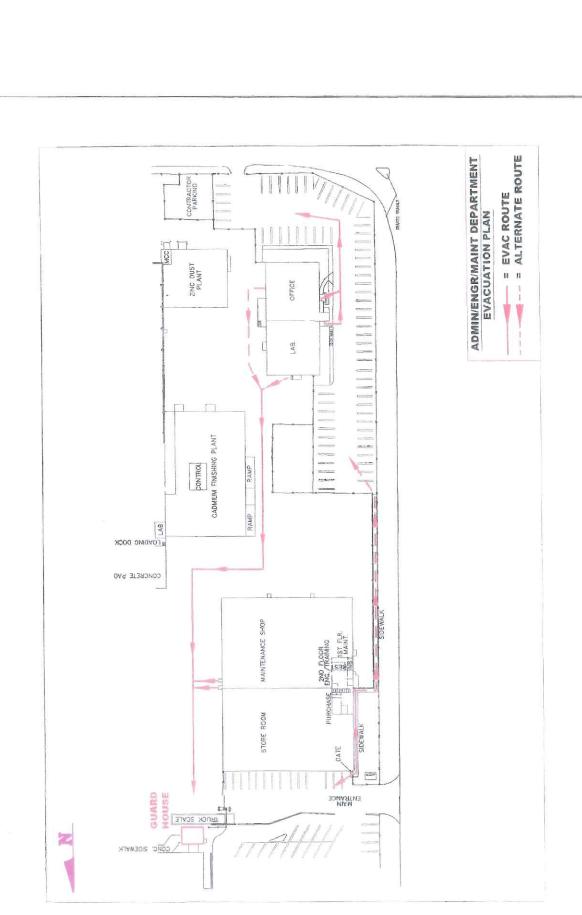












APPENDIX B

EQUIPMENT TABLES

Table 1

Location and Content of Fire Equipment Boxes Big River Zinc Corporation Sauget, Illinois

Box Number	Location
A	South of main Casting Dept East of the South Contracting Gate
В	South of the Vehicle Shop along the West fence line
C	East of Cell room along East fence line
D	East of Leach/Purification along East fence line
E	East of the Specialty Casting Building - West of Cell room Unit #3
F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION/USE
One	1 1/2 in. Nozzle	Combination, Adjusts to fog or straight stream
One	Reducer	To reduce hydrant outlet to the fire hose (2 1/2 in. down to 1 1/2 in.)
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench. Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench to be used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose
One	Axe	Wood handle fireman axe

Table 2
Spill Response Kit Locations and Contents
Big River Zinc Corporation
Sauget, Illinois

Spill Kit #	Name of SPCC Area	Location Description	Contents Code
1	Drum Storage Area # 2	Roaster Mechanics area outside the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	# 4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	1
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cell room unit #3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cell room	1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cell room	1
13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1
14	Hazardous waste storage	N of leach bldg. W Cd storage building	2

Contents Code	1	2
	6 ea. 3'x10' socks	Shovels, push brooms, and
	4 ea. Absorbent Pillows	15 lb fire extinguisher
	75 ea. Absorbent mats	located in Leach Building.
	10 ea. Disposable Bags/ties	20 lb CO fire extinguisher
	_	to be installed in Cd
		storage building by Sep 1,
		2005.

MALES OF THE PROPERTY OF THE P	CHARLES AND	List of the second seco				mil wit C being
DEPARTMENT	LOCATION	Location 2	BRZ #	B/C UNIT	OCC STILL	
Admin Bldg	SE Entry			3ZHFC	3ZHFD	20 Ib ABC DRY CHEM
Admin Bldg	O/S Accounting			3ZHFR	3ZHFS	20 Ib ABC DRY CHEM Cart-Op
Admin bldg	Sample Room	Al- Al-Appliant representation of the second		3ZHGO	3ZHG1	20 Ib BC DRY CHEM Cart-OP
Admin Bldg	Lobby			3ZHFF	3ZHFG	5 Ib ABC DRY CHEM
Admin Bldg	East Hallway	By Judy Tilk's office				- Annual trees
Admin Bldg	Basement Break room			3ZHFW	3ZHFX	5 Ib ABC DRY CHEM Cart-OP
Admin Bldg	Lab 1 East			3ZHG2	3ZHG3	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Lab 2 East			3ZHG4	3ZHG5	5 Ib ABC DRY CHEM Cart-Op
Admin Bldg	Computer Room			32НГН	3ZHFJ	17 lb Halon 1211
Admin Bldg	Computer Room	L A CAMPAGA AND AND AND AND AND AND AND AND AND AN		3ZHFK	3ZHFL	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFM	3ZHFN	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFP	3ZHFQ	17 lb Halon 1211
Admin Blding	Mail Room			3ZHFT	3ZHFV	15 lb Carbon Dioxide
Admin Blding	Lab 1 West		Q41	3ZHFY	3ZHFZ	15 lb Carbon Dioxide
Casting	@ Furnace	Under Baghouse	2	3ZHGJ	3ZHGK	10 lb Carbon Dioxide
Casting	Skimming - Platform	Skimmings Downstairs	C33	3ZHF7	3ZHF8	15 lb Carbon Dioxide
Casting	Skimming- Platform	Skimmings Upstairs	C34	3ZHF9	3ZHFB	15 lb Carbon Dioxide
Casting	Electric Room 1	Zn Dust MCC North	ડ	3ZHGX	3ZHGY	15 lb Carbon Dioxide
Casting	Electric Room 2	Zn Dust MCC West	C12	3ZHGZ	зхнно	15 lb Carbon Dioxide
Casting	Ship Office	Outside foremans office ?		3ZHG6	3ZHG7	20 lb Carbon Dioxide
Casting	Electric Room	MCC North	හ	3ZHGN	3ZHGP	20 lb Carbon Dioxide
Casting	Cadmium	Cd West Basement Wall	C31	3ZHHC	ЗZНИD	20 lb Carbon Dioxide
Casting	East Building Platform	Die Cast Up	C24	3ZHJ2	3ZHJ3	20 lb Carbon Dioxide
Casting	Back Dr E maint	West Wall		3ZHJD	3ZHJF	20 lb Carbon Dioxide
Casting	Center FI	Cathode Floor	C10	3ZHGV	3ZHGW	10 lb ABC Dry Chem
Casting	East Building North Door	Die cast North end	C26	3ZHHT	ЗХННУ	20 Ib ABC DRY CHEM
Casting	New Sub Station	East	C36	3ZHMR	3ZHMS	20 Ib ABC DRY CHEM
Casting	Ship Office	Foremans Office	ပ	3ZHG8	3ZHG9	20 lb ABC DRY CHEM Cart-Op
Casting	Ship Office	O/S Metal Analyzing room	22	3ZHGB	3ZHGC	20 Ib ABC DRY CHEM Cart-OP
Casting	By Scale	East Middle	C3	3ZHGD	3ZHGF	20 Ib ABC DRY CHEM Cart-Op
Casting	SE corner	South East Corner	Ce	3ZHGG	3ZHGH	20 lb ABC DRY CHEM Cart-Op
Casting	Westwall	West Middle	CS	эхнсо	3ZHGR	20 lb ABC DRY CHEM Cart-Op
Casting	North end	M/L holding Conveyor	C4	3ZHGS	3ZHGT	20 lb ABC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn Dust East wall	C13	3ZHH7	3ZHH8	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium	Cd south basement wall	C30	3ZHHF	3ZHHG	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium	Cd oxide room basement	C29	32ннн	3ZННЈ	20 lb ABC DRY CHEM Cart-Op

MATTER AND ADDRESS OF THE PARTY	2000				L	
DEPARTMENT	LOCATION	Location 2	BRZ#	B/C ON	E/C OI II	
Casting	Cadmium office	Cd office	C28	3ZHHK	ЗZННГ	20 Ib ABC DRY CHEM Cart-Op
Casting	By W Ramp	Cd west door	C32	3ZHHM	3ZHHN	20 lb ABC DRY CHEM Cart-Op
Casting	Center Wall	Zn Dust Baghoust	C17	ЗХННР	згина	20 Lb ABC DRY CHEM Cart-Op
Casting	East Bldg Center Hoist	T Metal pin press	C35	3ZHHW	3ZHHX	20 lb ABC DRY CHEM Cart-Op
Casting	East Bldg S Dr	Die Cast down	C23	3ZHJO	3ZHJ1	20 Ib ABC DRY CHEM Cart-Op
Casting	Maintenance Warehouse	Old Zn dust 2nd floor E	C20	3ZHJG	3ZHJH	20 Ib ABC DRY CHEM Cart-Op
Castina	Maintenance 2nd Level		C21	3ZHJL	3ZHJM	20 Ib ABC DRY CHEM Cart-Op
Casting	3rd Level Maintenance		C22	NCHZ6	зzнлР	20 Ib BC DRY CHEM Cart-Op
Casting	Maintenance Whse	Old Zn dust north wall	C19	3ZHJQ	3ZHJR	20 Ib BC DRY CHEM Cart -Op
Casting	Maintenance Front Door		C18	3ZHJS	3ZHJT	20 lb BC DRY CHEM Cart-Op
Casting	Dust Hopper		C14	3ZHH1	3ZHH2	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust South blowbin	C15	3ZHH3	3ZHH4	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust basement	C16	3ZHH5	зхнне	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust baghouse	C17	3ZHH9	32ННВ	30 lb Class D Cart-Op
Casting	Electric room	MCC South	80	3ZHGL	3ZHGM	20 lb Carbon Dioxide
Casting	New Sub Station	West	C37	3ZHMT	3ZHMV	20 Ib ABC DRY CHEM
Casting	East Bldg W Wall	Die Cast west wall	C25	ЗХННУ	3ZHHZ	20 lb ABC DRY CHEM Cart-Op
Cellroom	Unit 1 Substation	1st Floor, East of Store rm	M5	3ZHM3	3ZHM4	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North wall -Center		3ZHM5	3ZHM6	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North of Stairs		3ZHM7	3ZHM8	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd Floor Top of Stairs		3ZHM9	3ZHMB	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	Electrician office - West side		3ZHMC	3ZHMD	15 lb Carbon Dioxide
Cellroom	Sub Station #8	By South Door		3ZHMP	3ZHMQ	20 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floof center, wheel unit		3ZHMF	3ZHMG	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floor North, wheel unit		3ZHMH	3ZHMJ	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st floor by drill press		3ZHM1	3ZHM2	20 lb ABC DRY CHEM cart-Op
Cellroom	Unit 1 Substation	2nd floor by west door		3ZHMK	3ZHML	20 Ib ABC DRY CHEM Cart-OP
Cellroom	Unit 1 Substation	2nd floor, South center wall		3ZHMM	3ZHMN	20 Ib ABC DRY CHEM Cart-Op
Cellroom	Elect room	MCC Below Office	٨7	3ZHLL	3ZHLM	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East wall - North	M17	3ZHLV	3ZHLW	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - Center	M18	3ZHLX	3ZHLY	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - South	M19	3ZHLZ	3ZHMO	10 lb Carbon Dioxide
Cellroom	Prod Area	North - By steps		3ZHLS	3ZHLT	15 lb Carbon Dioxide
Cellroom	Sub 13	Outside East Door		3ZHJV	3ZHJW	20 lb Carbon Dioxide
Cellroom	Control room	W. Foremans Office	T6	3ZHLP	3ZHLN	20 Ib ABC DRY CHEM
Cellroom	TCA Towers Ground N	Column	T14	3ZHLO	3ZHL1	20 Ib ABC DRY CHEM Cart-Op

DEPARTMENT	IOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE	
Cellroom	TCA Towers Ground N	By catwalk over hot sump	T14	(1)	3ZHL3	20 lb ABC DRY CHEM Cart-Op	
Cellroom	TCA Towers SW	Fan Floor		3ZHL4	3ZHL5	20 lb ABC DRY CHEM Cart-Op	
Cellroom	TCA Towers NW	Fan Floor		3ZHL6	3ZHL7	20 lb ABC DRY CHEM Cart-Op	
	South	S. Basement	T8	3ZHLD	3ZHLF	20 lb ABC DRY CHEM Cart-Op	
	Center	Center Basement West	T9	3ZHLG	3ZНГН	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Center	Basement West		3ZHLJ	3ZHLK	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Control room	S. Cellroom	T3	3ZHLQ	3ZHLR	20 lb ABC DRY CHEM Cart-Op	
Cellroom	Head Tankman Shack	Outside East Door	T12	3ZHQZ	3ZHRO	20 lb ABC DRY CHEM Cart-Op	
Cellroom	TCA Shack	By Water fountain		3ZHL8	3ZHL9	5 Ib ABC DRY CHEM Cart-Op	
Cellroom	Unit # 3	Stripping floor - North		3FZSL	3FZSM	20 Ib ABC DRY CHEM	
Cellroom	Unit #3	Stripping floor - Mid		3FZSK	3FZSJ	20 Ib ABC DRY CHEM	
Cellroom	Unit # 3	Stripping floor- South		3FZSH	3FZSG	20 Ib ABC DRY CHEM	
Cellroom	Unit#3	Basement - South		3FZSQ	3FZSR	20 lb ABC DRY CHEM	
Cellroom	Unit#3	Basement - North		3FZSS	3FZST	20 Ib ABC DRY CHEM	
Cellroom	Sub # 11	West wall		3FZS4	3FZS5	20 lb Carbon Dioxide	
Cellroom	Sub # 11	East wall		3FZSB	3FZSC	20 lb Carbon Dioxide	
Cellroom	Sub # 11	North wall -West		3FZS6	3FZS7	20 lb Carbon Dioxide	
Cellroom	Sub # 11	North wall - East		3FZS8	3FZS9	20 lb Carbon Dioxide	
Cellroom	Clean-up cells	Southwest corner		3FZSN	3FZSP	20 Ib ABC DRY CHEM	
Cellroom	Gypsum removal towers	Top- Northeast corner		3ZHQX	3ZHQY	20 Ib ABC DRY CHEM	
Cellroom	North Basement	NE of high press. pump	L17	3ZHPK	3ZHPL	20 lb ABC DRY CHEM cart-Op	
Engineering	Copy room	On floor by door		3ZHNN	3ZHNP	20 Ib ABC DRY CHEM	
Leach Purification	-	By # 1 tank, North by door		3ZHP5	3ZHP6	20 Ib ABC DRY CHEM	
Leach/Purification	MCC by paper press area	Inside MCC (Blueroom)		3ZHQS	3ZHQT	10 lb Carbon Dioxide	
		North End		3ZHP7	3ZHP8	15 lb Carbon Dioxide	
	# 9 Substation	South End	L31	3ZHP9	3ZHPB	15 lb Carbon Dioxide	Delete
Leach/Purification	O/S Maint			32НРН	3ZHPJ	15 lb Carbon Dioxide	Building
Leach/Purification	1st Stage	Midway by air drier		3ZHQ0	3ZHQ1	15 lb Carbon Dioxide	Demolished
	Leach	South of #3 Leach Tank		3ZHPT	3ZHPV	20 lb Carbon Dioxide	2007
Leach/Purification	2nd Stage	West pole by #1 Tank		3ZHQ4	3ZHQ5	20 lb Carbon Dioxide	
Leach/Purification	2nd Stage	East of Presses		3ZHQ8	3ZHQ9	20 lb Carbon Dioxide	
Leach/Purification	Eimco Floor	West of #3 Eimco	7	3ZHQ6	3ZHQ7	20 Ib ABC DRY CHEM	
Leach/Purification	Residue	North of Floc Make-up tank		3ZHQL	3ZHQM	20 Ib ABC DRY CHEM	
Leach/Purification	1st Stage new presses	Southeast corner		3ZHQN	3ZHQP	20 Ib ABC DRY CHEM	
	ZSM	MCC Blower room		3ZHPC	3ZHPD	20 lb ABC DRY CHEM Cart-Op	

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

				100000	and more than the same	10//H	
DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SII E	T	
Leach/Purification	ZSM	South pole by locker	L32	3ZHPM	3ZHPN	20 lb ABC DRY CHEM cart-op	
	ZSM	Cd precip tanks by steps		3ZHPP	3ZHPQ	20 Ib ABC DRY CHEM Cart-Op	Delete
	Leach	South of # 1 Leach Tank		3ZHPR	3ZHPS	20 lb ABC DRY CHEM cart-op	Building
	Leach	N. Calcine bin top	L07	3ZHPW	3ZHPX	20 lb ABC DRY CHEM cart-op	Demolished
	1st Stage	1st Stage North	L8	3ZHPY	3ZHPZ	20 lb ABC DRY CHEM cart-op	2007
	1st Stage	1st Stage South	607	3ZHQ2	3ZHQ3	20 Ib ABC DRY CHEM cart-op	
	Residue MCC	Outside	L23	3ZHQB	3ZHQC	20 Ib ABC DRY CHEM Cart-op	
	Residue	Control room	L24	3ZHQD	3ZHQF	20 Ib ABC DRY CHEM Cart-Op	
	Residue Room	South Residue press		3ZHQG	ЗХНОН	20 lb ABC DRY CHEM cart-op	
	Residue Room	North press control panel		3ZHQJ	3ZHQK	20 Ib ABC DRY CHEM Cart-Op	
	Foremans Office	South wall	L14	3ZHQQ	3ZHQR	20 Ib ABC DRY CHEM cart-Op	
	Press paper area	South	L15	3ZHQV	3ZHQW	20 Ib ABC DRY CHEM Cart-OP	
	Eimco Sump	East of deep leg pit	L18	3FZRV	3FZRT		
	Southwest Leach-down	S.W. of Leach tanks	L 2	3FZRY	3FZRZ		
	Inside North door	North of #3 Leach Tank	L3	3FZS0			
	East of Classifier/Ball mill	On pole by ramp	L4	3FZRW			
_	Leach/Purification	Northwest of Maint. Shack		3ZHPF	3ZHPG	20 Ib ABC DRY CHEM	
	Casting-Near back door	Mounted to work bench		3ZHJB	3ZHJC	20 lb ABC DRY CHEM Cart-Op	
	Cadmium	Maintenance shop		3ZHHR	3ZHHS	5 lb ABC DRY CHEM Cart-OP	
	Cellroom Maintenance area	Northwest of welding booth		3ZHLB	3ZHLC	20 lb ABC DRY CHEM Cart-Op	
	Gas pumps	west side		3ZHKP	3ZHKQ	20 lb ABC DRY CHEM Cart-Op	
	Main Compressor Room	Near West door		3ZHK5	3ZHK6	20 lb Carbon Dioxide	
	Main Compressor Room	Between #7 & 8 Air Control		3ZHK3	3ZHK4	20 lb ABC DRY CHEM Cart-Op	
	Oil house	North side		3ZHK7	3ZHK8	20 Ib ABC DRY CHEM	
	Oil house	South side		3ZНК9	3ZHKB	20 lb ABC DRY CHEM Cart-Op	
	Quanset Hut	Front door		3ZHJ4	3ZHJ5	20 lb ABC DRY CHEM Cart-Op	
	Quanset hut	Center		3ZHJ6	3ZHJ7	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Quanset hut	Back door		3ZHJ8	3ZHJ9	20 lb ABC DRY CHEM Cart-Op	
Maintenance	Vehicle Shop	By bulk oil drum		3ZHN4	3ZHN5	15 lb Carbon Dioxide	
	Pump Shop	By parts wash	M27	3ZHND	3ZHNF	15 lb Carbon Dioxide	
	CRNE AP308	CP5		3ZHMW	3ZHMX	2.5 ABC DRY CHEM	
	SW Pole	East of hand wash area	M24	3ZHN6	3ZHN7	20 Ib ABC DRY CHEM Cart-OP	
	Vehicle Shop	South door	M25	3ZHN8	3ZHN9	20 lb ABC DRY CHEM Cart-Op	
	Welding Shop	Near South door	M26	3ZHNB	3ZHNC	20 Ib ABC DRY CHEM Cart-Op	
	Instrument Shop	South wall		3ZHNJ	3ZHNK	20 lb ABC DRY CHEM Cart-Op	
	Crane CP1	Drott Go-Devil		3ZHNO	3ZHN1	5 Ib ABC DRY CHEM	

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		LUCATION	± כ			
Maintenance	Crane 2	L. L. A.			3ZHMZ	5 ID ABC DKY CHEM Car-OD
Maintenance	Cart CS7			3ZHN2	3ZHN3	5 lb ABC DRY CHEM Cart-Op
	Office	Northwest Corner		3ZHNL	3ZHNM	5 Ib ABC DRY CHEM Cart-OP
Maintenance	Near north wall on workbench West of horrizontal mill	West of horrizontal mill		3ZHNG	3ZHNH	30 lb Class D Cart-Op
Maintenance	Roast/Acid maint shack	Inside on column		3ZHCF	3ZHCG	15 lb Carbon Díoxide
Pre-Leach	By Maint.			3ZHBS	згнвт	15 lb Carbon Dioxide
Pre-Leach	N By Steps	WT Vaccum pump at steps	R31	ЗZНВХ	3ZHBY	15 lb Carbon Dioxide
Pre-Leach	O/S Oil HS	Oil House	R17	3ZНСН	3ZHCJ	20 Ib ABC DRY CHEM
Pre-Leach	Conveyor	-14000		3ZHBV	3ZHBW	20 lb ABC DRY CHEM Cart -OP
Pre-Leach	Pump room Basement			3ZHBZ	зхнсо	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	By Hopper			3ZHC3	3ZHC4	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Line Cnter			3ZHC5	3ZHC6	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Line East			3ZHC7	3ZHC8	20 lb ABC DRY CHEM CartOp
Pre-Leach	Pump House	Out of the Control of		3ZHCC	3ZHCD	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	By sub # 7	East of Pre heater on Post	R33	3ZHCK	3ZHCL	20 lb ABC DRY CHEM Cart-Op
Pre-Leach	Control room	Control room	R21	3ZHC1	3ZHC2	20 lb Carbon Dioxide
Purchasing	Store room	Southwest Corner	S3	3ZHNS	3ZHNT	20 lb ABC DRY CHEM Cart-Op
Purchasing	Store room	West pole	S2	3ZHNV	3ZHNW	20 lb ABC DRY CHEM cart-Op
Purchasing	Store room	East pole		3ZHNX	3ZHNY	20 lb ABC DRY CHEM Cart-Op
Purchasing	Hallway	Between restrooms		3ZHNQ	3ZHNR	5 lb ABC DRY CHEM Cart-Op
Roast/ Acid	Ore shed - Center	Conc. Storage center	R2	3ZHCT	3ZHCV	15 lb Carbon Dioxide
Roast/Acid	Acid plant	Coolong Tower	R20	3ZHCP	зднса	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Acid Control Room	Acid Control	R19	3ZHCM	3ZHCN	15 lb Carbon Dioxide
Roast/Acid	SE Substation	Motor Control Room-east	R15	3ZHD4	3ZHD5	15 lb Carbon Dioxide
Roast/Acid	Elect Room SW	Motor Control Room-South	R18	3ZHD8	3ZHD9	15 lb Carbon Dioxide
Roast/Acid	Sub Station # 7	Motor Control Room-West	R16	3ZHDB	3ZHDC	15 lb Carbon Dioxide
Roast/Acid	Sub Station # 7	Substation 7	R34	3ZHDD	3ZHDF	15 lb Carbon Dioxide
Roast/Acid	Roaster Southeast		- 000	3ZHDL	3ZHDM	15 ib Carbon Dioxide
Roast/Acid	Roaster East Stair				3ZHDR	15 lb Carbon Dioxide
Roast/Acid	Roof Center	Hoist house 5th	R5	3ZHF5	3ZHF6	15 lb Carbon Dioxide
Roast/Acid	Ore Shed North	Conc. Storage north	R3	3ZHCR	3ZHCS	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed South	Conc. Storage South	R	3ZHCW	3ZHCX	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed Train Dock NW	Conc. unloading SW	R25	3ZHCY	3ZHCZ	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	Ore Shed Train Dock SW	Conc. Unloading E	R26	ЗZНDО	3ZHD1	20 Ib ABC DRY CHEM Cart-Op
Roast/Acid	Ore Shed Train Dock SE	Conc. Unloading- East	R27	3ZHD2	3ZHD3	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	Roaster North	Roaster 1st Fir Windbox	R14	3ZHD6	3ZHD7	20 Ib ABC DRY CHEM Cart-Op

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DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
Roast/Acid	Roaster West Stairs	Air Compressor Building	R35	3ZHDG	ЗZНDН	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster SW	Roaster 2nd Fir mid-West	R13	зZНDJ	3ZHDK	20 Ib ABC DRY CHEM Cart-Op
Roast/Acid	Roaster Center	LIA CANADA PARA PARA PARA PARA PARA PARA PARA P		3ZHDN	3ZHDP	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Roaster SE	Roaster 3rd floor-east	R9	3ZHDS	3ZHDT	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	Roaster SW	Roaster 3rd floor-west	R8	3ZHDV	3ZHDW	20 Ib ABC DRY CHEM Cart-OP
Roast/Acid	By Hoppers			3ZHDX	3ZHDY	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	By Hoppers	Roaster 4th floor	R6	3ZHDZ	3ZHFO	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	By Hoppers	Roaster 4th floor	R7	3ZHF1	3ZHF2	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Bin control		R29	3ZHF3	3ZHF4	20 lb ABC DRY CHEM Cart-Op
Roast/Acid	Foremans Office	Foremans office	R36	3ZHC9	3ZHCB	5 Ib ABC DRY CHEM
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		3ZHRS	3ZHRT	15 lb Carbon Dioxide
Roast/Acid	Spill Kit(Hazardous Waste)	Sludge Pad Sump		W-878545		20lb Carbon Dioxide
Safety	Wash room			3ZHKW	зхнкх	20 Ib ABC DRY CHEM
Safety	Store room			3ZHKY	3ZHKZ	20 Ib ABC DRY CHEM
Security	Lunchroom	South wall by light switch	808	3ZHKT	3ZHKV	20 Ib ABC DRY CHEM
Security	Mens Locker room	Dirty side E wall by coat rack S10	S10	3ZHP3	3ZHP4	15 lb Carbon Dioxide
Security	Mens locker room	W wall next to boiler room	S12	3ZHNZ	3ZHPO	20 lb ABC DRY CHEM Cart-Op
Security	Mens locker room	S Wall next to thermostat	S11	3ZHP1	3ZHP2	20lb ABC DRY CHEM Cart-Op
Security	Guard shack lobby	North wall clock alley	S16	3ZHKR	3ZHKS	20 Ib ABC DRY CHEM Cart-Op
Security	Womens locker room	S wall in hall/salary side	S15	3ZHJZ	3ZHKO	20 Ib ABC DRY CHEM
Security	Womens Locker room	N wall in hall/hourly side	S14	3ZHK1	3ZHK2	5 Ib ABC DRY CHEM
J 1877						AND THE PERSON OF THE PERSON O
Spare	Safety Storage			3ZHRJ	3ZHRK	10 lb ABC Dry Chem
Spare	Safety storage			3ZHR1	3ZHR5	20 Ib ABC DRY CHEM
Spare	Safety Storage			3ZHR2	3ZHR5	20 Ib ABC DRY CHEM
Spare	Safety Storage			3ZHR3	3ZHR5	20 Ib ABC DRY CHEM
Spare	Safety Storage			3ZHR4	3ZHR5	20 lb ABC DRY CHEM
Spare	Safety Storage	- J. A.		3ZHR6	3ZHRC	20 lb ABC DRY CHEM Cart_op
Spare	Safety Storage			3ZHRT	3ZHRC	20 Ib ABC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHR9	3ZHRC	20 lb ABC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHRB	3ZHRC	20 lb BC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHRD	3ZHRF	30 lb Class D Cart-Op
Spare	Safety Storage			3ZHRG	3ZHRH	17 lb Halon 1211
Spare	Safety Storage			3ZHRQ	3ZHRR	2.5 Gallon Pressurized Water
Spare	Safety Storage	4.4817-071		3ZHR8	3ZHRC	20 Ib ABC DRY CHEM Cart-Op
Spare	Safety Storage			3ZHRL	3ZHRM	5 Ib ABC DRY CHEM

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Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ#	BRZ # B/C UNIT E	B/C SITE	TYPE
Test Plant	Pilot Bay	By telephone		3ZHKK	3ZHKL	20 lb Carbon Dioxide
Test Plant	Annex	By East door		3ZHKC	3ZHKD	20 Ib ABC DRY CHEM
Test Plant	Zinc Powder	The state of the s		3ZHKF	3ZHKG	20 Ib ABC DRY CHEM
Test Plant	Office	By Restroom		3ZHKM	3ZHKN	5 Ib ABC DRY CHEM cart-OP
Test Plant	Zinc Powder	Platform		3ZHKH	3ZHKJ	30 lb Class D Cart-Op

RCRA CONTINGENCY PLAN
AND EMERGENCY RESPONSE PROCEDURES

BIG RIVER ZINC CORPORATION SAUGET, ILLINOIS

Revised March 14, 2008

NO.

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INTRODUCTION

This RCRA Contingency Plan and associated Emergency Response Procedures (ERP) have been prepared for the Big River Zinc Corporation (BRZ) facility in Sauget, Illinois, in compliance with the requirements outlined in the U.S. Environmental Protection Agency (USEPA) rules and regulations for the Resource Conservation and Recovery Act (RCRA) - Hazardous Waste 40 CFR Part 264. Specifically, this document contains the requirements set forth by RCRA regarding a facility's Contingency Plan and Emergency Procedures for the accidental release of hazardous waste (40 CFR Part 264, Subpart D).

This Plan will be updated if the plan fails in an emergency, the facility changes in a way that increases the potential for fires, explosions, or releases of hazardous waste, or there is a change in the emergency coordinators or emergency equipment lists.

DESCRIPTION OF FACILITY

Big River Zinc Corporation (BRZ), Sauget, Illinois is engaged in the production of zinc. Sulfuric acid, copper cake, lead/silver concentrate, copper precipitate, and cadmium oxide are sold as by-products. The manufacturing process begins with fluid bed roasting of zinc sulfide concentrates. Sulfur dioxide is produced during the roasting process and is used to create sulfuric acid. The impure zinc oxide from the roaster is treated in several stages with sulfuric acid to leach out metals such as zinc, copper, cobalt, and cadmium. These metals are recovered and are sold as by-products to other industries, as is the lead and silver contained in the insoluble lead concentrate recovered from the leaching steps. The zinc goes through several additional steps and is recovered from solution by an electrowinning process. The sheets are washed and fed into an electric-induction-melting furnace. The zinc is then poured into a mold, cooled, and shipped to the customers.

The facility is located at Route 3 and Monsanto Ave., Sauget, Illinois (Figure 1). The facility has three production shifts. Facility personnel are on site 24 hours per day, 7 days per week. The facility property is oriented on a north-south axis and comprises 35.4 acres with approximately 60% of the property under roof or paved.

BRZ has one hazardous waste roll-off container, which is located west of the cadmium building. Filters containing metals are disposed of in the roll-off container. The roll-off is emptied at least every 90 days.

3.0.

EMERGENCY REPORTING PROCEDURES

At all times, there is at least one employee at the facility or individuals who can be contacted with the responsibility for coordinating all internal emergency response measures at the facility. As required by federal regulations, the Emergency Coordinator (EC), or his alternate, is thoroughly familiar with all aspects of the ERP, all operations and activities at the facility, and the location of appropriate facility records. The EC and alternates may be reached through the security department.

3.1 Implementation of the Emergency Response Plan

The primary or the alternate Emergency Coordinators will decide which portions of this ERP are to be implemented following an evaluation of the site conditions. The basis of the EC's decision is his assessment of the magnitude of the emergency. The EC will determine if the emergency presents an actual or possible threat to human health and the environment, or if Big River Zinc personnel can control the situation.

Some types of emergencies that require full implementation of the ERP include:

- · A fire that could spread off site;
- · A fire that is too large to extinguish with a portable fire extinguisher,
- · A spill or release of hazardous material that results in airborne constituents; and
- · Uncontainable runoff due to a large fire, spill or release of material.

3.2 Internal Notification Procedures

<u>Personnel</u>

Upon discovering a situation that may represent an emergency, plant personnel will:

- Report the situation to a supervisor immediately or call security if the supervisor cannot be found immediately; and
- b. Verbally warn other personnel if the situation is an immediate threat to their safety.

Supervisor/Security

When notified of an emergency situation, the supervisor/security will:

 Take necessary steps to prevent injury to personnel, damage to equipment, and any potential fire hazard; and

b. Contact the Emergency Coordinator or Alternate.

Note: It is BRZ policy that employees are not permitted to respond to uncontrolled releases of hazardous material or, likely uncontrolled releases, or place themselves in danger during a major uncontrolled emergency situation such as a large fire, an explosion or series of explosions, or life threatening major spill or fume release.

the only releases that BRZ employees are allowed to respond to are those that are incidental where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel.

In the event of an uncontrolled release or release that is likely to become uncontrolled, use the evacuation procedure.

At BRZ, uncontrolled releases are not likely to result from hazardous waste. So use the following procedures unless personal safety is threatened as described in the preceding 3 paragraphs.

Emergency Coordinator

The primary EC (or an alternate) will follow the procedures below in the event of a release, explosion, fire, or other emergency:

- Assess the situation and if warranted:
 - Declare an emergency and notify all plant personnel with instructions by two-way radios. If there is a release, fire, or explosion that could threaten human health or environment outside the facility, the EC is to immediately declare an emergency.
 - Notify security to call for police and/or fire department. The police or fire departments have the responsibility for coordinating outside response efforts. Telephone numbers of emergency response agencies are located in Section 3.3. A two-way radio connection is also available in the security office for contacting the police and fire departments.
- Commit and direct activities of any and all resources available that are necessary to carry out the ERP.
 The EC will focus on measures to eliminate potential harm to human health and the environment.

Whenever there is a release, fire, or explosion, the EC will act without delay to identify the character, exact source, amount, and aerial extent of the released materials. This may be accomplished by observation or review of facility records, manifests, and, if necessary, by chemical analysis. The EC will inspect for possible hazards to human health or the environment, both direct and indirect. This assessment will consider onsite and offsite effects as required.

Throughout the emergency, the EC will take measures, which are reasonable and necessary to ensure that fires and/or releases do not have an effect on any other substances at the facility.

3.3 Emergency Contact Phone List

Security

Ext. 110 (Internal Plant Phone)

(618) 274-5000 ext. 110 (Outside Phone)

Plant Radio

Primary Emergency Coordinator

Mike Altepeter

(618) 274-5000 Ext. 194 (office)

(314) 846-8093 (Home) (618) 410-8021 (cell)

Home Address

2936 Point Drive

St. Louis, MO 63129

Alternate Emergency Coordinator

Anthony Thomas

(618) 274-5000 Ext. 198 (office)

(618) 410-8020 (cell) (314) 383-8020 (Home)

Home Address

7009 Lexington

St. Louis, Mo 63121

Second Alternate Emergency Coordinator

Steve Ash

(61802745000 ext 243 (office)

(618) 410 4703 (cell)

Home Address

548 Parkside Commons

Collinsville, IL 62234

Federal

National Response Center

(800) 424-8802

(Release of Hazardous Substances)

USEPA Region V

(312) 353-2000

State

Illinois Emergency Management Agency

(800) 782-7860

Local Emergency Response: Sauget Police, Fire, Ambulance

911

Local Emergency Planning Committee (LEPC)

(618) 277-3012

Mr. Don Feher

Local Emergency Planning Committee

321 W. "F" Street

Belleville IL 62220-1193

Hospital

Memorial Hospital Emergency

(618) 257-5840

Attn. Mr. Don Schneider 4500 Memorial Drive Belleville, IL 62226

Contractor Support

Heritage Environmental

(800) 388-3500

Attn: Mr. Dan Hans 1188 Pershall Road

Bellfountaine, MO 63137

Onyx Industrial Services

(618) 931 0010

Fred Davidson

121 East Chain of Rocks Road

Mitchell, IL 62040

Bellon Environmental Company

(314) 890 8600

Bob Goodman 600 Fairview

St. Louis, MO 63132

Big River Zinc has discussed the contents of this plan, and has provided a copy of the plant location to the Sauget Fire and Police Departments, the LEPC, Heritage Environmental and Memorial Hospital.

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3.4 Evacuation Plan

The EC will assist the fire department in determining the need for evacuation of the area surrounding the plant. This assessment is based on the EC's knowledge of the hazardous materials involved, the site conditions, and the current weather conditions. The role of the EC in this situation is an advisory one, and the decision to evacuate an area is the responsibility of the appropriate agencies.

The EC and alternates are responsible for the plant-wide evacuations only. Designated evacuation routes for plant personnel are displayed on Figure 2. Communication of evacuation to employees is by two-way radios, alarms, intercom, and other personnel to insure that all employees are informed and evacuated. The fire alarms are tested monthly to ensure they are in proper working condition. If an evacuation is ordered, plant personnel shall discontinue operation of all equipment and evacuate the area as soon as possible. Evacuation routes are determined according to the plant area affected.

Upon receiving instruction by two-way radio or by activation of an audible warning device, supervisors are to instruct employees to leave the facility according to their predetermined exit routes. The employees are to go to the designated assembly point, west of the facility, in the employee parking lot. Once the plant is evacuated, the supervisor of each area takes a prompt and accurate account of all personnel to ensure that everyone is accounted for.

The fire department is responsible for evacuation plans within the surrounding area and for coordinating local resources, including the police department and hospitals to assist in the implementation of the evacuation plan.

The EC, in consultation with the fire department and other local agencies, as necessary, will decide when reoccupation of the facility is possible. Only after following all the post-emergency procedures (see Section 5.0) can the facility resume operation.

3.5 Emergency Response Procedures

3.5.1 Fire and Explosion Emergency Response

Please see BRZ policy statement concerning major emergency situations on Page 4 of this document.

An employee, upon detecting a fire or imminent explosion in the facility, will initiate the following actions:

- Use hand-held fire extinguishers to control or extinguish the fire if the fire is in an initial, controllable stage and no potential for imminent explosion exists.
- Contact his supervisor or security. Security will locate the EC and inform him of the fire and its location. Activate the alarm system. The supervisor will begin response preparation.

 Upon receiving available information, the EC or security will call the fire department to inform them of the situation and receive instruction.

After following the steps outlined above for emergency situations, the EC or, in his absence, the supervisor, must do the following:

- Take action to shut off electrical power and any gas in the vicinity of the fire location. Stop process
 and/or operations that may interfere with the emergency response actions;
- Take action, if necessary and safe to do so, to place absorbent materials around drains to prevent spilled hazardous waste from entering the sewer system;
- · Notify all unauthorized personnel to vacate the area per evacuation plans; and
- · Follow any instruction given by the fire department.

In addition, the EC must also:

- Note the current weather conditions and estimate the current wind direction and speed;
- Identify the character, source, amount, and aerial extent of any released hazardous materials by observation and review of facility records, manifests, and, if necessary, by chemical analysis; and
- Determine if the situation necessitates complete evacuation of the plant site. Furthermore, the EC will assist the Fire Department in their decision to evacuate the surrounding area.

If the situation meets the criteria for full implementation, at the first opportunity, the EC shall report the emergency to the National Response Center (800-424-8802) and the Illinois Emergency Management Agency (800-782-7860). This verbal report includes:

- Name, address, and telephone number of the reporter;
- · Name and address of the facility;
- · Time and type of incident;
- Name and reportable quantity of material involved to the extent known;
- · Extent of injuries, if any; and
- Possible hazards offsite to human health and the environment.

3.5.2 Spill Emergency Response

Any employee discovering a hazardous waste spill is to immediately notify his supervisor or security. Security will notify the EC or alternate. The EC will assess the situation and act as follows:

- Clear the area of unauthorized personnel. Stop process and/or operations that may interfere with the emergency response;
- Identify the source or cause of the release material and obtain a Material Safety Data Sheet(s)
 (MSDS). Use MSDS information to guide response and determine personal protective equipment
 (PPE) required;
- Direct trained personnel to don the appropriate PPE, as used in normal job duties, and re-containerize
 the spilled material;
- Alert local authorities if material may reach outside facility property;
- · Rope off and/or barricade the area to prevent entry of unauthorized personnel;
- Take measures to contain the spill;
- · Direct cleanup so that all hazardous materials are placed in properly labeled containers;
- Ensure that spill material, water, and adsorbents are placed in Department of Transportation (DOT) approved containers for ultimate disposal; and
- Insure that no incompatible wastes are stored within the spill area until cleanup is complete.

RELEASE REPORTING REQUIREMENTS

4.1 General

In the event of external release of a hazardous material, the procedures outlined in Section 3.0 will be followed. Prior to contacting state and local agencies, the EC will gather as much information about the incident as quickly as possible. The concerned agencies will then be contacted with initial information. The appropriate agencies will be kept informed of any new, additional, or changed information regarding the incident.

4.2 Release of RCRA Hazardous Waste

In case of a fire, explosion, or release of hazardous waste (equal to or greater than the reportable quantity for the material), as defined under RCRA (40 CFR, Section 261) which could threaten human health or the environment <u>outside the facility</u>, concerned agencies will be contacted as soon as possible by the EC. If the evacuation of surrounding areas may be required, local emergency response teams will be alerted. The following agencies will be contacted by the EC:

Federal	National Response Center	(800) 424-8802
	USEPA Region V	(312) 353-2000
State	Illinois Emergency Management Agency	(800) 782-7860
Local	Sauget Fire, Police, Ambulance	911
	Mr. Don Feher Local Emergency Planning Committee (LEPC) 321 W. "F" Street Belleville, IL 62220-1193	(618) 277-3012

Contractor Support:

Heritage Environmental (800) 377-2440 Attn. Mr. Dan Hans 1188 Pershall Road Bellfountaine, MO 63137

Or

Veolia Industrial Services (618) 931 0010 Gary Timm 121 East Chain-of-Rocks Road

Mitchell, IL 62040

POST-EMERGENCY PROCEDURES

When the emergency is contained, and a threat to human health and the environment no longer exists, the EC will take the following post-emergency actions:

- Decontamination/cleanup;
- Waste management;
- Post-emergency reporting; and
- Post-emergency assessment.

5.1 Decontamination/Cleanup

All of the equipment used in the emergency response procedures will be either decontaminated or properly containerized for disposal. Any non-emergency response equipment, such as materials or machinery, also affected by the emergency response will be decontaminated or disposed. The EC is responsible for arranging immediate replacement of any spent emergency response materials.

5.2 Waste Management

Waste residual materials, along with emergency response equipment needing disposal, will be collected and containerized in accordance with applicable regulations governing the management of such materials. Once all hazardous material is properly containerized, storage and disposal will be conducted according to applicable regulations.

5.3 Post-Emergency Reporting

The EC is responsible for ensuring the preparation and submittal of all required reports. A release, fire or explosion requires a written report to the USEPA Region V within 15 days of the event and the IEPA upon request only. The report will include:

- Name, address, and telephone number of the facility;
- USEPA identification number for the site;
- Date, time, and type of incident (e.g., fire, spill, etc.);
- Name and quantity of material(s) involved;
- Extent of injuries, if any;

- Assessment of any actual or potential hazards to human health or the environment;
- Procedures followed to reduce and remove released materials;
- Estimated quantity and disposition of the recovered material that resulted from the incident;
- · Corrective measures taken;
- · Whether an evacuation was required; and
- Name of individuals who have also been contacted or notified.

5.4 Post-Emergency Assessment

After the emergency episode, the EC will determine the causes of the emergency and analyze the effectiveness of emergency response procedures. The ERP will be modified if it is determined that procedures are inadequate or ineffective. If equipment capabilities are found unacceptable, necessary improvements will be made.

EMERGENCY EQUIPMENT

6.1 Communication Systems

Four different communication systems are available in the case of an emergency. They are described below.

Type	<u>Description</u>	Inspection Required
Two-Way Radios	The base station for the two-way radios is located in the main Security Office at the main gatehouse. Six two-way radios are located in the security department. Each of the four departments has a minimum of two radios that are normally carried by the supervisors. Many of the operators also have two-way radios. Fourteen radios are assigned to maintenance supervisors and the "rotating shift" electrician and mechanic.	Radios are in use daily so any problems with the system or individual radios would be detected immediately.
	Two-way radio communications with the police and fire departments of Sauget is available to security.	
	A weather monitor is available 24-hours per day in case of a weather emergency.	
Telephones	There are three lines into the Security Office. Telephones are located in all supervisors offices, all control rooms, all administrative offices, and in various maintenance areas. Inner plant phones do not have access to outside lines so security must be called in case of emergency.	Telephones are in use daily so any problems would be detected immediately.
Cell Phones	There are 19 Cell Phones issued to Key company management personnel. These can be used to contact people needed while cutside or inside the plant. The cell phones can be used as normal phone or "walkie talkie" mode.	The cell phones are in use daily so any problems would be detected immediately.
Message Center Operations	A continuing liaison can be maintained through the Security Office for needed information by using the telephone communications. However, emergency communications would generally be handled through the two-way radios and Cell Phones for faster response time.	N/A

6.2 Fire Equipment

Fire response equipment is located throughout the facility. This includes sprinkler systems, hand held fire extinguishers, and fire equipment boxes.

A smoke detection system is located in the computer room on the bottom floor of the administrative building and in the Safety Office. These systems sound in the main security office when activated. Five automatic deluge sprinkler systems are located throughout the plant. These systems and the twelve fire hydrants are supplied with water under pressure through the fire protection pump. An alarm siren and warning light are located on the outside of the building to alert personnel that the system is in use. The sprinkler systems are checked once a month by the maintenance department.

A list of the location and contents of the hand held fire extinguishers is located in Table 1 of Appendix B. The department supervisors inspect the extinguishers on a weekly basis. Documented inspections of the fire extinguishers are located in the safety department. In other areas, a designated person inspects the extinguishers on a monthly basis. Fire extinguisher training is held annually for all employees. No employees are trained when hired.

There are seven fire equipment boxes located throughout the facility. A list of these locations and contents of the boxes are provided in Table 2 of Appendix B. The boxes are inspected on a monthly basis by the security department.

6.3 Personnel Protective Equipment

Please see BRZ policy statement concerning major emergency situations on Page 4 of this document.

In case of a release, fire, or explosion, goggles, face shields, respiratory protection, full body acid suits, and barrier cream are available from the Safety Department. Rubber dielectric boots, heavy-duty rubber gloves, neoprene gloves, vinyl and latex gloves, and Tyvek disposable clothing are available from the storeroom.

6.4 First Aid

Stretchers are available in the foreman's office of every department. Safety showers are located at various locations in each department. Stokes basket and confined space rescue equipment are stored in the respirator room.

6.5 Spill Response Kits

Spill response kits containing appropriate tools and sorbent materials are located throughout the facility. A list of the spill kits and their locations are presented in Table 3 of Appendix B.

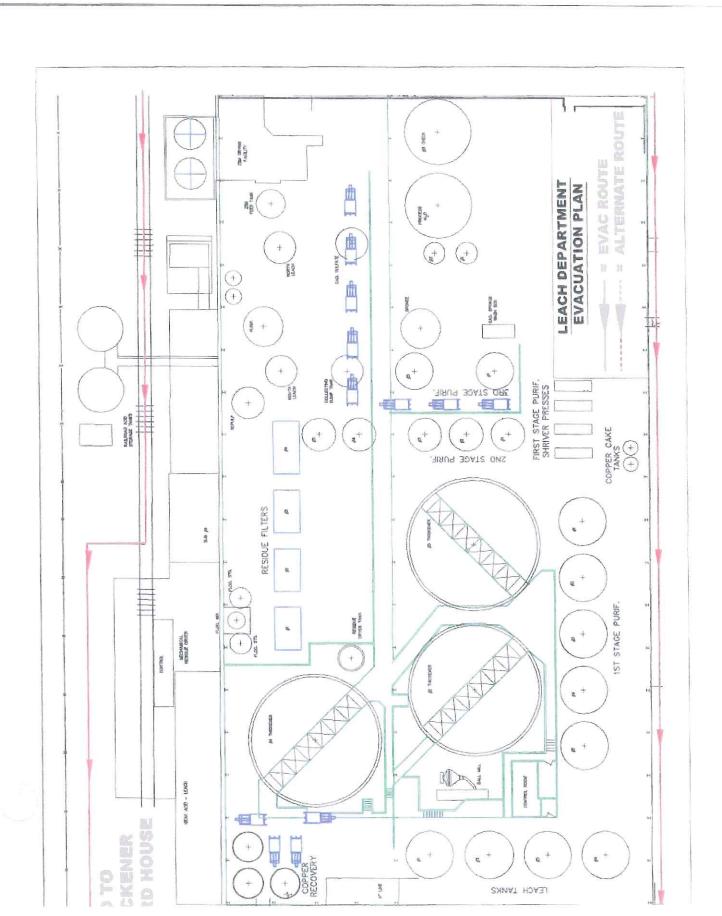
7.0 Training

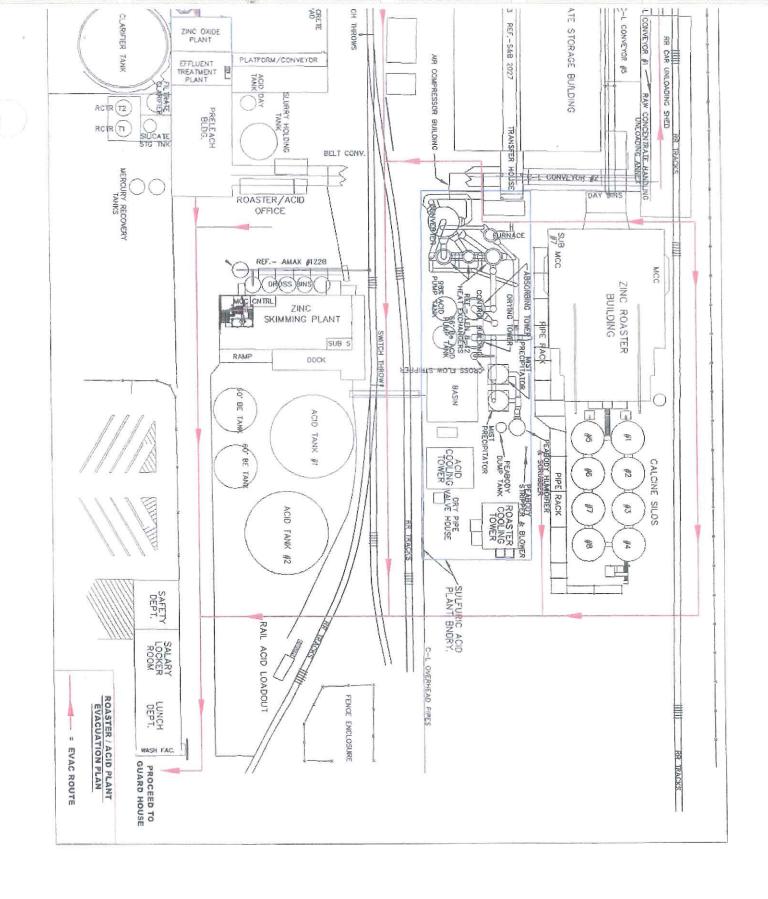
Copies of all training documents will be kept in the Environmental manager's files and in Safety dept files, and on the Server. Please refer to the RCRA training document for a detailed description on training. As a minimum the program will document:

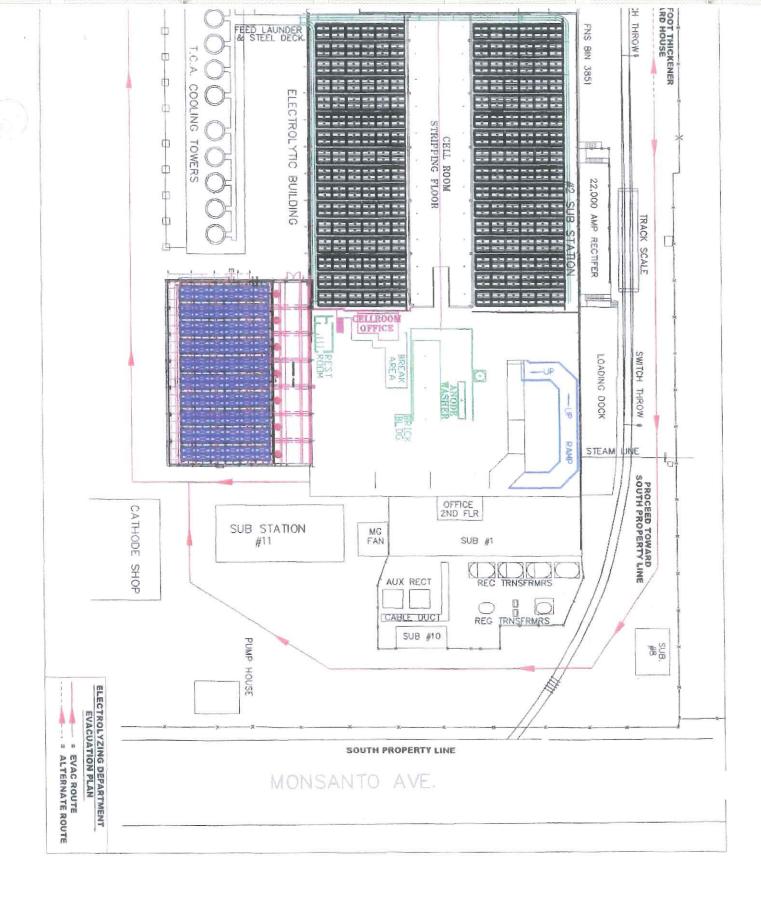
- a. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
- b. A written job description for each position described above.
- c. A written description of the type and amount (RCRA Training Document) of both introductory and continuing training that will be given to each person described above.
- d. Training records detailing training given will be kept for at least three years from the date the employee last worked for the company.

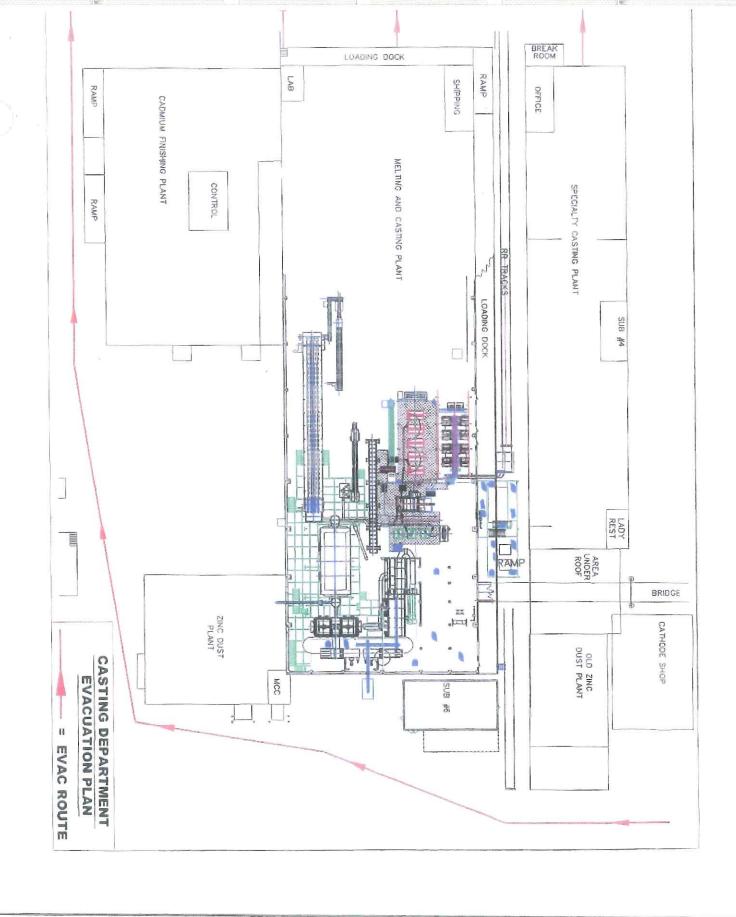
APPENDIXA

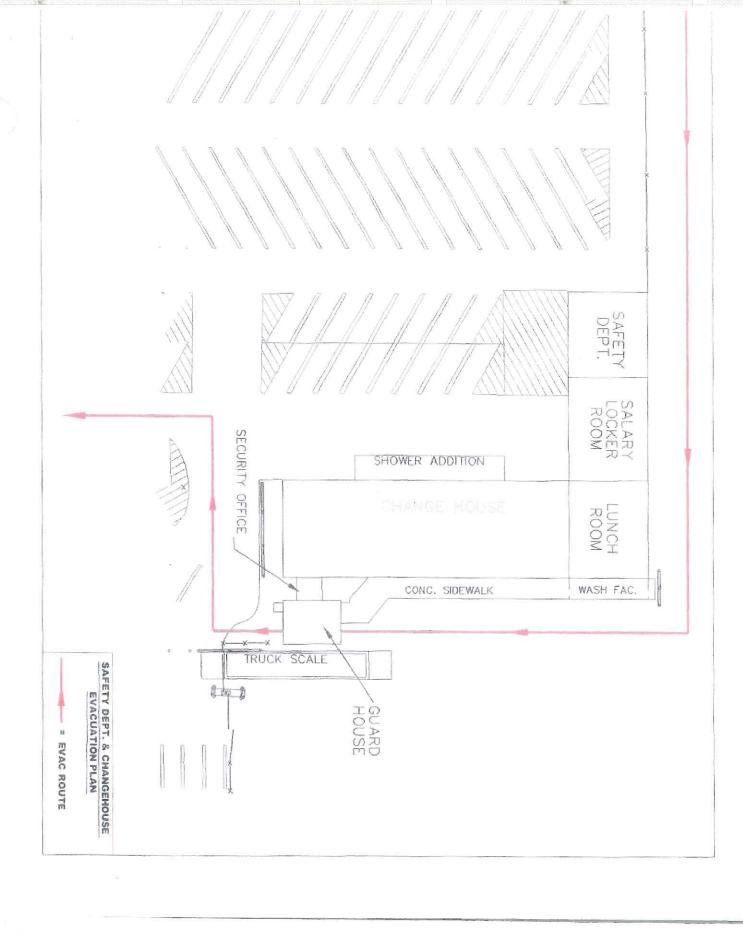
FACILITY SITE DIAGRAMS

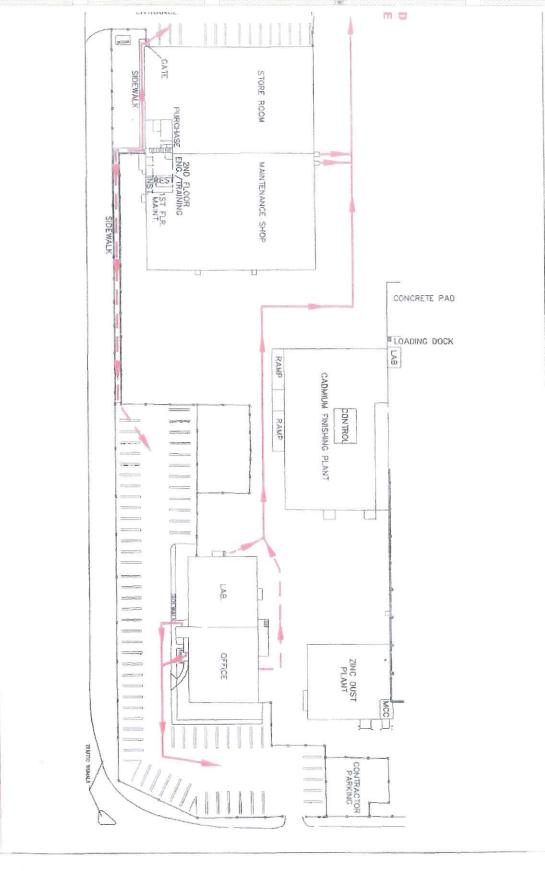












ADMIN/ENGR/MAINT DEPARTMENT EVACUATION PLAN

= EVAC ROUTE = ALTERNATE ROUTE

Table 2 Spill Response Kit Locations and Contents Big River Zinc Corporation Sauget, Illinois

Spill Kit	Name of SPCC Area	Location Description	Contents
#			Code
1	Drum Storage Area # 2	Roaster Mechanics area outside the south outer wall	1
2	#5 Substation-pad mounted transformer	Inside doorway, SE corner of skimmings plant	1
3	Waste Oil # 2	Outside the NW corner of the oil house	1
4	Diesel & Gasoline dispensing area	Above ground tanks, located west of RR tracks and S of cafeteria	1
5	Waste Oil # 1	Outside of building at the SW corner of the vehicle shop	1
6	Substation # 13A & 13B Pad mounted transformer	Substation located N of special casting & S of the purified storage tanks	1
7	#4 Substation transformer	Inside E wall of the special casting bldg. N of the T-metal furnace	1
8	Substation # 6, 6A & 6B, Pad mounted transformer	S end of the main casting bldg. Inside the fenced area of the transformer yard	1
9	Substation # 11, Pad mounted transformer	S of cell room unit #3	1
10	Satellite Kerosene storage tank (winter only)	Outside SE corner of the Quonset storage	1
11	Substation # 1, Pad mounted transformer	Fenced transformer area, south end of cell room	1
12	Substation # 2, Pad mounted transformer	SE corner of fenced transformer yard, S end of cell room	1
13	Substation # 9, Pad mounted transformer	E side of ground level L/P, south of residue loading	1
14	Hazardous waste storage	Satellite stations for oil dry in vehicle shop and oil shed. Satellite station for parts washer in Vehicle shop	2

B-8

APPENDIX B

EQUIPMENT TABLES

Table 1

Location and Content of Fire Equipment Boxes Big River Zinc Corporation Sauget, Illinois

Box Number	Location
A	South of main Casting Dept East of the South Contracting Gate
В	South of the Vehicle Shop along the West fence line
C	East of Cell room along East fence line
D	East of Leach/Purification along East fence line
Е	East of the Specialty Casting Building - West of Cell room Unit #3
F	At the Oil House
G	Northwest of the Acid Plant Converter, by the railroad tracks

Contents of Fire Equipment Boxes

QUANTITY	ITEM	DESCRIPTION	USE/CAPABILITIES
One	1 1/2 in. Nozzle	Brass nozzle, Combination, Adjusts to fog or straight stream	Enable user to adjust stream of water for the need at the time of a fire.
One	Reducer	Threaded reducer 2.5" by 1.5"	To connect hydrant outlet to the smaller fire hose
Two	Universal Spanner Wrenches	Cast aluminum 'C' shaped wrench.	Use to tighten reducer to hydrant and to connect fire hoses.
One	Hydrant Wrench	Adjustable combination hydrant and spanner wrench	Used to open the hydrant by turning the top post.
Three	Fire Hoses	50 foot sections of 1 1/2 in. industrial strength fire hose	Use to make hose capable of reaching a fire.
One	Axe	Wood handle fireman axe	Use to break open items so water can reach fire.

Contents Code 1	Contents	Use/capabilities
	6 ea. 3' x 10' adsorbent socks	Used to contain hazardous flowing material absorb it and preventing the contaminant from reaching sewer or groundwater.
	4 ea. Adsorbent Pillows	Used to directly absorb flowing contaminant
	75 ea. Absorbent mats	Used to directly absorb flowing contaminant and wipe down equipment
	10 ea. bags and ties	Used to contain used socks pillows, mats, and other contaminated material and transfer to Waste containers.

Contents Code 2	Contents	Use/capabilities
	Shovel	Pick up spilled solid waste and return to container
	Push Broom	Push waste into pile for removal with shovel
	Fire extinguisher	Extinguish fire
	Absorbent material	To place on dusty waste to keep it from becoming airborne and facilitate returning to container

DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
Admin Bldg	SE Entry	**************************************		3ZHFC	3ZHFD	20 Ib ABC DRY CHEM
Admin Bldg	O/S Accounting			3ZHFR	3ZHFS	20 lb ABC DRY CHEM Cart-Op
Admin bldg	Sample Room			3ZHGO	3ZHG1	20 Ib BC DRY CHEM Cart-OP
Admin Bldg	Lobby			3ZHFF	3ZHFG	5 Ib ABC DRY CHEM
Admin Bldg	East Hallway	By Judy Tilk's office				The state of the s
Admin Bldg	Basement Break room			3ZHFW	3ZHFX	5 lb ABC DRY CHEM Cart-OP
Admin Bldg	Lab 1 East			3ZHG2	3ZHG3	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Lab 2 East			3ZHG4	3ZHG5	5 lb ABC DRY CHEM Cart-Op
Admin Bldg	Computer Room			3ZHFH	3ZHFJ	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFK	3ZHFL	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFM	3ZHFN	17 lb Halon 1211
Admin Bldg	Computer Room			3ZHFP	3ZHFQ	17 lb Halon 1211
Admin Blding	Mail Room			3ZHFT	3ZHFV	15 lb Carbon Dioxide
Admin Blding	Lab 1 West	1.1.2.2.1	Q41	3ZHFY	3ZHFZ	15 lb Carbon Dioxide
Casting	@ Furnace	Under Baghouse	C7	3ZHGJ	3ZHGK	10 lb Carbon Dioxide
Casting	Skimming - Platform	Skimmings Downstairs	C33	3ZHF7	3ZHF8	15 lb Carbon Dioxide
Casting	Skimming- Platform	Skimmings Upstairs	Ω 2	3ZHF9	3ZHFB	15 b Carbon Dioxide
Casting	Electric Room 1	Zn Dust MCC North	C11	3ZHGX	3ZHGY	15 lb Carbon Dioxide
Casting	Electric Room 2	Zn Dust MCC West	C12	3ZHGZ	3ZННО	15 lb Carbon Dioxide
Casting	Ship Office	Outside foremans office?	-	3ZHG6	3ZHG7	20 lb Carbon Dioxide
Casting	Electric Room	MCC North	රි	3ZHGN	3ZHGP	20 lb Carbon Dioxide
Casting	Cadmium	Cd West Basement Wall	C31	3ZHНС	3ZHHD	20 lb Carbon Dioxide
Casting	East Building Platform	Die Cast Up	C24	3ZHJ2	3ZHJ3	20 lb Carbon Dioxide
Casting	Back Dr E maint	West Wall		3ZHJD	3ZHJF	20 lb Carbon Dioxide
Casting	Center FI	Cathode Floor	C10	3ZHGV	3ZHGW	10 lb ABC Dry Chem
Casting	East Building North Door	Die cast North end	C26	3ZHHT	3ZННV	20 lb ABC DRY CHEM
Casting	New Sub Station	Hast	C36	3ZHMR	3ZHMS	20 Ib ABC DRY CHEM
Casting	Ship Office	Foremans Office	Ω	3ZHG8	3ZHG9	20 lb ABC DRY CHEM Cart-Op
Casting	Ship Office	O/S Metal Analyzing room	22	3ZHGB	3ZHGC	20 lb ABC DRY CHEM Cart-OP
Casting	By Scale	East Middle	CS	3ZHGD	3ZHGF	20 lb ABC DRY CHEM Cart-Op
Casting	SE corner	South East Corner	င္တ	3ZHGG	3ZHGH	20 lb ABC DRY CHEM Cart-Op
Casting	West wall	West Middle	C5	3ZHGQ	3ZHGR	20 lb ABC DRY CHEM Cart-Op
Casting	North end	M/L holding Conveyor	2	3ZHGS	3ZHGT	20 lb ABC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn Dust East wall	C13	3ZHH7	3ZНН8	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium	Cd south basement wall	C30	32MHF	SUUZ	ZO 10 ABC BY L CHEM Cart-Op

Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
Casting	Cadmium	Cd oxide room basement	C29	3ZHHH	3ZННЈ	20 lb ABC DRY CHEM Cart-Op
Casting	Cadmium office	Cd office	C28	3ZHHK	3ZHHL	20 lb ABC DRY CHEM Cart-Op
Casting	By W Ramp	Cd west door	C32	3ZHHM	3ZHHN	20 lb ABC DRY CHEM Cart-Op
Casting	Center Wall	Zn Dust Baghoust	C17	3ZHHP	3ZHHQ	20 Lb ABC DRY CHEM Cart-Op
Casting	East Bldg Center Hoist	T Metal pin press	C35	3ZHHW	3ZHHX	20 lb ABC DRY CHEM Cart-Op
Casting	East Bldg S Dr	Die Cast down	C23	3ZHJO	3ZHJ1	20 lb ABC DRY CHEM Cart-Op
Casting	Maintenance Warehouse	Old Zn dust 2nd floor E	C20	3ZHJG	3ZНЈН	20 lb ABC DRY CHEM Cart-Op
Casting	Maintenance 2nd Level	Old Zn dust 2nd floor N	C21	3ZHJL	3ZHJM	20 lb ABC DRY CHEM Cart-Op
Casting	3rd Level Maintenance	Old Zn Dust 3rd floor	C22	3ZHJN	3ZHJP	20 lb BC DRY CHEM Cart-Op
Casting	Maintenance Whse	Old Zn dust north wall	C19	3ZHJQ	3ZHJR	20 lb BC DRY CHEM Cart -Op
Casting	Maintenance Front Door	Old Zn dust East wall	C18	3ZHJS	3ZHJT	20 lb BC DRY CHEM Cart-Op
Casting	Dust Hopper	Zn dust North Blowbin	C14	3ZHH1	3ZHH2	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust South blowbin	C15	3ZНН3	3ZHH4	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust basement	C16	3ZHH5	3ZHH6	30 lb Class D Cart-Op
Casting	Dust Hopper	Zn dust baghouse	C17	3ZHH9	3ZННВ	30 lb Class D Cart-Op
Casting	Electric room	MCC South	CG	3ZHGL	3ZHGM	20 lb Carbon Dioxide
Casting	New Sub Station	West	C37	3ZHMT	3ZHMV	20 Ib ABC DRY CHEM
Casting	East Bldg W Wall	Die Cast west wall	C25	3ZHHY	3ZHHZ	20 lb ABC DRY CHEM Cart-Op
Cellroom	Unit 1 Substation	1st Floor, East of Store rm	N5	3ZHM3	3ZHM4	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North wall -Center		3ZHM5	3ZHM6	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st Floor North of Stairs		3ZHM7	3ZHM8	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd Floor Top of Stairs		3ZHM9	3ZHMB	15 lb Carbon Dioxide
Cellroom	Unit 1 Substation	Electrician office - West side		3ZHMC	3ZHMD	15 lb Carbon Dioxide
Cellroom	Sub Station #8	By South Door		3ZHMP	3ZHMQ	20 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floof center, wheel unit		3ZHMF	3ZHMG	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	2nd floor North, wheel unit		3ZHMH	3ZHMJ	50 lb Carbon Dioxide
Cellroom	Unit 1 Substation	1st floor by drill press		3ZHM1	3ZHM2	20 lb ABC DRY CHEM cart-Op
Cellroom	Unit 1 Substation	2nd floor by west door		3ZHMK	3ZHML	20 lb ABC DRY CHEM Cart-OP
Cellroom	Unit 1 Substation	2nd floor, South center wall		3ZHMM	3ZHMN	20 lb ABC DRY CHEM Cart-Op
Cellroom	Elect room	MCC Below Office	Y7	3ZHLL	3ZHLM	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East wall - North	M17	3ZHLV	3ZHLW	10 lb Carbon Dioxide
Celiroom	Sub Station 2	East Wall - Center	M18	3ZHLX	3ZHLY	10 lb Carbon Dioxide
Cellroom	Sub Station 2	East Wall - South	M19	3ZHLZ	3ZHMO	10 lb Carbon Dioxide
Cellroom	Prod Area	North - By steps		3ZHLS	3ZHLT	15 lb Carbon Dioxide
Cellroom	Sub 13	Outside East Door		3ZHJV	3ZHJW	20 lb Carbon Dioxide

20 lb ABC DRY CHEM	3ZHQ7	3ZHQ6	5	West of #3 Eimco	Eimco Floor	Leach/Purification
20 lb Carbon Dioxide	3ZHQ9	3ZHQ8		East of Presses	2nd Stage	Leach/Purification
20 lb Carbon Dioxide	3ZHQ5	3ZHQ4		West pole by #1 Tank	2nd Stage	Leach/Purification
20 lb Carbon Dioxide	3ZHPV	3ZHPT		South of #3 Leach Tank	Leach	Leach/Purification
15 lb Carbon Dioxide	3ZHQ1	3ZHQ0		Midway by air drier	1st Stage	Leach/Purification
15 lb Carbon Dioxide	3ZНРЈ	ЗΖНРН			O/S Maint	Leach/Purification
15 lb Carbon Dioxide	3ZHPB	3ZHP9	L31	South End	#9 Substation	Leach/Purification
15 lb Carbon Dioxide	3ZHP8	3ZHP7		North End	#9 Substation	Leach/Purification
10 lb Carbon Dioxide	3ZHQT	3ZHQS	ł	Inside MCC (Blueroom)	MCC by paper press area	Leach/Purification
20 Ib ABC DRY CHEM	3ZHP6	3ZHP5		By # 1 tank, North by door	Weak Acid Leach	Leach Purification
20 Ib ABC DRY CHEM	3ZHNP	3ZHNN		On floor by door	Copy room	Engineering
20 IB ABC DRY CHEM carrop	32HPL	3ZHPK	L17	NE of high press. pump	North Basement	Cellroom
20 Ib ABC DRY CHEM	3ZHQY	3ZHQX	i	Top- Northeast corner	Gypsum removal towers	Cellroom
20 Ib ABC DRY CHEM	3FZSP	3FZSN		Southwest corner	Clean-up cells	Cellroom
20 lb Carbon Dioxide	3FZS9	3FZS8		North wall - East	Sub # 11	Cellroom
20 lb Carbon Dioxide	3FZS7	3FZS6		North wall -West	Sub # 11	Cellroom
20 lb Carbon Dioxide	3FZSC	3FZSB		East wall	Sub # 11	Cellroom
20 lb Carbon Dioxide	3FZS5	3FZS4		West wall	Sub # 11	Cellroom
20 Ib ABC DRY CHEM	3FZST	3FZSS		Basement - North	Unit#3	Cellroom
20 Ib ABC DRY CHEM	3FZSR	3FZSQ		Basement - South	Unit#3	Cellroom
20 Ib ABC DRY CHEM	3FZSG	3FZSH		Stripping floor- South	Unit #3	Cellroom
20 Ib ABC DRY CHEM	3FZSJ	3FZSK		Stripping floor - Mid	Unit #3	Cellroom
20 Ib ABC DRY CHEM	3FZSM	3FZSL		Stripping floor - North	Unit #3	Cellroom
5 lb ABC DRY CHEM Cart-Op	3ZHL9	3ZHL8		By Water fountain	TCA Shack	Cellroom
20 lb ABC DRY CHEM Cart-Op	3ZHRO	3ZHQZ	T12	Outside East Door	Head Tankman Shack	Cellroom
20 lb ABC DRY CHEM Cart-Op	3ZHLR	3ZHLQ	3	S. Cellroom	Control room	Cellroom
20 lb ABC DRY CHEM Cart-Op	3ZHLK	3ZHLJ		Basement West	Center	Cellroom
20 lb ABC DRY CHEM Cart-Op	3ZHLH	3ZHLG	19	Center Basement West	Center	Cellroom
20 lb ABC DRY CHEM Cart-Op	3ZHLF	3ZHLD	T8	S. Basement	South	Cellroom
20 lb ABC DRY CHEM Cart-Op	3ZHL7	3ZHL6		Fan Floor	TCA Towers NW	Cellroom
20 lb ABC DRY CHEM Cart-Op	3ZHL5	3ZHL4		Fan Floor	TCA Towers SW	Celiroom
20 lb ABC DRY CHEM Cart-Op	3ZHL3	3ZHL2	T14	By catwalk over hot sump	TCA Towers Ground N	Cellroom
20 lb ABC DRY CHEM Cart-Op	3ZHL1	3ZHLO	T14	Column	TCA Towers Ground N	Cellroom
20 Ib ABC DRY CHEM	3ZHLN	3ZHLP	76	W. Foremans Office	Control room	Cellroom
ТҮРЕ	B/C SITE	# B/C UNIT	BRZ#	Location 2	LOCATION	DEPARTMENT

Residue North of Flox Malke-up tank 32HQL 32 32HQL 32 32HQN 32 32HQN 32 32HQN 32 32HQN 32 32HQN 32 32HQN 32 32HQN 32 32HQN 32 32HPP 32 32HQQ 32 32H	DCDADTMENT	IOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
1st Stage new presses Southeast corner 3ZHQN 3ZHQN 3ZHQN 3ZHQN 3ZHQN 3ZHQN 3ZHQN 3ZHQN 3ZHQN 3ZHPN 3ZHQN	each/Purification		North of Floc Make-up tank		3ZHQL	3ZHQM	20 Ib ABC DRY CHEM
ZSM MCC Blower room 3ZHPC 3ZHPD ZSM South pole by locker 1.22 3ZHPM 3ZHPN ZSM Ga precip tanks by steps 3ZHPR 3ZHPR 3ZHPR ZSM Ga precip tanks by steps 3ZHPR 3ZHPR 3ZHPR Leach N. Calicine bin top L07 3ZHPW 3ZHPS Leach L07 3ZHPW 3ZHPS Leach L08 3ZHPW 3ZHQZ 3ZHQZ 1st Stage South L09 3ZHQZ 3ZHQZ 1st Stage Control room L24 3ZHQG 3ZHQG Residue Room North press control panel L14 3ZHQG 3ZHQG Residue Room North press control panel L14 3ZHQG 3ZHQG Residue Room North press control panel L14 3ZHQG 3ZHQG Residue Room North press control panel L14 3ZHQG 3ZHQG Residue Room South stale L18 3ZHQG 3ZHQG Sachug <td>Leach/Purification</td> <td>1st Stage new presses</td> <td>Southeast corner</td> <td></td> <td>3ZHQN</td> <td></td> <td>20 Ib ABC DRY CHEM</td>	Leach/Purification	1st Stage new presses	Southeast corner		3ZHQN		20 Ib ABC DRY CHEM
ZSM South pole by locker L32 3ZHPM 3ZHPM ZSM Cd precip tanks by steps 3ZHPP 3ZHPP 3ZHPP Leach N. Cacline bin top L07 3ZHPP 3ZHPPX Leach N. Cacline bin top L07 3ZHPPX 3ZHPX 1st Stage 1st Stage North L09 3ZHQZ 3ZHQZ 1st Stage 1st Stage North L09 3ZHQZ 3ZHQZ Residue Roorm North press control panel L24 3ZHQG 3ZHQG Residue Roorm North press control panel L14 3ZHQG 3ZHQG Residue Roorm North press control panel L14 3ZHQG 3ZHQG Residue Roorm North press control panel L14 3ZHQG 3ZHQG Residue Roorm North press control panel L14 3ZHQG 3ZHQG Residue Roorm North press control panel L15 3ZHQG 3ZHQG Residue Roorm South wall L15 3ZHQG 3ZHQG Sarky SZHQ	Leach/Purification	ZSM	MCC Blower room		3ZHPC		20 lb ABC DRY CHEM Cart-Op
ZSM Ccd precip tanks by steps 3ZHPP 3ZHPP Leach South of # 1 Leach Tank 3ZHPW 3ZHPW Leach N. Calcine bin top L07 3ZHPW 3ZHPW 1st Stage 1st Stage North L8 3ZHPW 3ZHPZ 1st Stage South L09 3ZHQZ 3ZHQZ 1st Stage South L18 3ZHQZ 3ZHQZ 1st Stage South L18 3ZHQZ 3ZHQZ 2st Stage South South	Leach/Purification	MSZ	South pole by locker	L32	3ZHPM	-	20 lb ABC DRY CHEM cart-op
Leach South of # 1 Leach Tank 3ZHPR 3ZHPR Leach N. Calcine bin top L07 3ZHPW 3ZHPY Leach N. Calcine bin top L07 3ZHPW 3ZHPY 1st Stage 1st Stage South L09 3ZHQZ 3ZHQZ 1st Stage 1st Stage South L09 3ZHQZ 3ZHQZ Residue MCC Outside L24 3ZHQB 3ZHQG Residue Room North press control panel L24 3ZHQG 3ZHQG Residue Room North press control panel L14 3ZHQG 3ZHQR Residue Room North press control panel L14 3ZHQG 3ZHQR Residue Room North wall L15 3ZHQG 3ZHQR Residue Room North wall L15 3ZHQG 3ZHQR Residue Room South wall L15 3ZHQG 3ZHQR Eimco Sump East of deep leg pit L18 3ZHQG 3ZHQR Bast Go f Disciple Sump Sump 3ZHQG 3ZHQG 3Z	Leach/Purification	MSZ	Cd precip tanks by steps		3ZHPP		20 lb ABC DRY CHEM Cart-Op
Leach N. Calcine bin top L07 3ZHPW 3ZHPX 1st Stage 1st Stage North L8 3ZHPY 3ZHPZ 1st Stage 1st Stage South L09 3ZHQ2 3ZHQ3 1st Stage Couth L09 3ZHQB 3ZHQB Residue MCC Control room L24 3ZHQB 3ZHQC Residue MCC Control room L24 3ZHQB 3ZHQC Residue MCC South Residue press L14 3ZHQB 3ZHQC Residue Room North Residue press L14 3ZHQG 3ZHQC Residue Room North Residue press L14 3ZHQG 3ZHQC Residue Room North Residue press L14 3ZHQG 3ZHQC Residue Room South Residue press L14 3ZHQG 3ZHQC Press paper area East of deep leg pit L18 3FZRV 3FZRY East of Classifier/Ball mill On pole by ramp L14 3FZRY 3FZRY Surpar Surpar Maintenance shop	Leach/Purification	Leach	South of # 1 Leach Tank		3ZHPR	1	20 lb ABC DRY CHEM cart-op
1st Stage 1st Stage 1st Stage South L8 3ZHPY 3ZHPZ 1st Stage 1st Stage South L09 3ZHQZ 3ZHQZ 3ZHQZ Residue MCC Outside L23 3ZHQB 3ZHQC Residue Room Control room L24 3ZHQG 3ZHQC Residue Room North press control panel L24 3ZHQG 3ZHQC Residue Room North wall L14 3ZHQQ 3ZHQR Residue Room North wall L15 3ZHQQ 3ZHQR Residue Room North wall L14 3ZHQQ 3ZHQR Residue Room North wall L15 3ZHQQ 3ZHQR Residue Room North wall L14 3ZHQQ 3ZHQR Residue Room South wall L15 3ZHQQ 3ZHQR Residue Room North wall L15 3ZHQQ 3ZHQR Residue Room North wall L1 3ZHQQ 3ZHQQ Rooth North wall L1 3ZHQQ 3ZHQ	Leach/Purification	Leach	N. Calcine bin top	L07	3ZHPW		20 lb ABC DRY CHEM cart-op
1st Stage 1st Stage South L09 3ZHQZ 3ZHQ3 Residue MCC Outside L23 3ZHQB 3ZHQB Residue MCC Control room L24 3ZHQB 3ZHQC Residue Room South Residue press L24 3ZHQB 3ZHQC Residue Room North press control panel L14 3ZHQQ 3ZHQR Foremans Office South wall L14 3ZHQQ 3ZHQR Press paper area South wall L14 3ZHQQ 3ZHQR Press paper area East of deep leg pit L18 3FZRV 3FZRY Eimco Sump East of Leach tanks L2 3FZRY 3FZRY South west Leach-down North of # 3 Leach Tank L2 3FZRY 3FZRY Southwest Leach-down Northwest of Maint. Shack L3 3FZRY 3FZRY Inside North door Mounted to work bench 3ZHJB 3ZHJB 3ZHJB Calmium Main Compressor Room Nest West door 3ZHKS 3ZHKG 3ZHKG Q	Leach/Purification	1st Stage	1st Stage North	18	3ZHPY		20 lb ABC DRY CHEM cart-op
Residue MCC Outside L23 3ZHQB 3ZHQF Residue Room Control room L24 3ZHQD 3ZHQF Residue Room North press control panel L24 3ZHQG 3ZHQF Residue Room North press control panel L14 3ZHQG 3ZHQK Foremans Office South wall L14 3ZHQQ 3ZHQK Foremans Office South wall L14 3ZHQQ 3ZHQK Press paper area East of deep leg pit L18 3ZHQV 3ZHQW Elmco Sump East of deep leg pit L18 3ZHQV 3ZHQW Elmco Sump East of deep leg pit L18 3ZHQV 3ZHQW Elmco Sump East of deep leg pit L18 3ZHQV 3ZHQW Elmco Sump East of deep leg pit L18 3ZHQV 3ZHQW Inside North door North side L2 3ZHJB 3ZHJB Calming-Near back door Northwest of welding booth JZHKB 3ZHKG Gast pumps North side 3ZHKG<	Leach/Purification	1st Stage	1st Stage South		3ZHQ2		20 lb ABC DRY CHEM cart-op
Residue Control room L24 3ZHQD 3ZHQF Residue Room South Residue press 3ZHQG 3ZHQG 3ZHQH Residue Room North press control panel L14 3ZHQG 3ZHQK Foremans Office South wall L14 3ZHQQ 3ZHQR Foremans Office South wall L15 3ZHQQ 3ZHQR Press paper area South L18 3FZRV 3ZHQW Elmco Sump East of deep leg pit L18 3FZRV 3FZRV Southwest Leach Hanks L2 3FZRV 3FZRZ Inside North door North of # 3 Leach Tank L3 3FZRV 3FZRZ Inside North door Northwest of Maint. Shack L3 3FZRV 3ZHR Leach/Purification Northwest of Maint. Shack L3 3FZRV 3ZHR Leach/Purification Northwest of Maint. Shack L3 3ZHR 3ZHR Callroom Maintenance area Northwest door 3ZHK 3ZHK 3ZHK Gas pumpes Sutk <	Leach/Purification	Residue MCC	Outside	L23	3ZHQB		20 lb ABC DRY CHEM Cart-op
Residue Room South Residue press 3ZHQG 3ZHQH Residue Room North press control panel 3ZHQJ 3ZHQK Foremans Office South wall L14 3ZHQQ 3ZHQK Press paper area South wall L15 3ZHQQ 3ZHQW Eimco Sump East of deep leg pit L18 3FZRY 3FZRT Southwest Leach-down North of # 3 Leach Tank L2 3FZRY 3FZRZ Inside North door North of # 3 Leach Tank L3 3FZRV 3FZRZ Inside North door North of # 3 Leach Tank L3 3FZRV 3FZRZ Inside North door North of # 3 Leach Tank L3 3FZRV 3FZRZ Leach/Purification Northwest of Maint Shack L4 3FZRW 3ZHJB 3ZHJG Casting-Near back door Mounted to work bench 3ZHJB 3ZHJB 3ZHJG Cadmium Maintenance shop 3ZHKG 3ZHKG 3ZHKG Gas pumps North side 3ZHKG 3ZHKG 3ZHKG Oil house	Leach/Purification	Residue	Control room	1.24	3ZHQD		20 lb ABC DRY CHEM Cart-Op
ation Residue Room North press control panel 3ZHQJ 3ZHQJ 3ZHQK ation Foremans Office South wall L14 3ZHQQ 3ZHQR ation Press paper area South L15 3ZHQW 3ZHQW ation Eimco Sump East of deep leg pit L18 3FZRV 3FZRT ation Inside North door North of # 3 Leach tanks L2 3FZRV 3FZRZ ation Inside North door North of # 3 Leach Tank L3 3FZRV 3FZRZ ation East of Classiffer/Ball mill On pole by ramp L4 3FZRV 3FZRV Leach/Purification Northwest of Maint. Shack L3 3FZRV 3ZHHR 3ZHHR Leach/Purification Mounted to work bench 3ZHHR 3ZHHR 3ZHR Cadmlum Morthwest of Maint. Shack 3ZHR 3ZHR 3ZHR Callroom Maintenance area Northwest of welding booth 3ZHK 3ZHK 3ZHK Allrow Sulk 3ZHK 3ZHK 3ZHK <td>Leach/Purification</td> <td>Residue Room</td> <td>South Residue press</td> <td></td> <td>3ZHQG</td> <td></td> <td>20 lb ABC DRY CHEM cart-op</td>	Leach/Purification	Residue Room	South Residue press		3ZHQG		20 lb ABC DRY CHEM cart-op
ation Foremans Office South wall L14 3ZHQQ 3ZHQW ation Press paper area South L15 3ZHQW 3ZHQW ation Eimco Sump East of deep leg pit L18 3FZRV 3FZRT ation Southwest Leach-down S.W. of Leach tanks L2 3FZRY 3FZRZ ation Inside North door North of # 3 Leach Tank L3 3FZRV 3FZRZ ation Leach/Purification Northwest of Maint. Shack L4 3FZRW 3ZHHS Leach/Purification Mounted to work bench 3ZHHR 3ZHHR 3ZHHS Cadmium Mounted to work bench 3ZHR 3ZHR 3ZHR Caling-Near back door Morthwest of welding booth 3ZHR 3ZHR 3ZHR Caling-Near back door Northwest side 3ZHR 3ZHKG 3ZHKG Gas pumps Near West door 3ZHK 3ZHKG 3ZHKG Main Compressor Room Near West door 3ZHK 3ZHKG 3ZHKG ALK	Leach/Purification	Residue Room	North press control panel		3ZHQJ		20 lb ABC DRY CHEM Cart-Up
ation Press paper area South L15 3ZHQV 3ZHQV ation Eimco Sump East of deep leg pit L18 3FZRV 3FZRV 3FZRZ ation Southwest Leach-down S.W. of Leach tanks L2 3FZRY 3FZRZ ation Inside North door North of # 3 Leach Tank L3 3FZRO 3FZRY ation East of Classifier/Ball mill On pole by ramp L4 3FZRW 3ZHPG Leach/Purification North west of Maint. Shack L3 3ZHPF 3ZHPG Casting-Near back door Mounted to work bench 3ZHJB 3ZHJB 3ZHJB Callroom Maintenance area Northwest of welding booth 3ZHKP 3ZHKB Cellroom Maintenance area Northwest door 3ZHKG 3ZHKG Main Compressor Room Near West door 3ZHKG 3ZHKG Quanset Hut Front door 3ZHKG 3ZHKG Quanset hut South side 3ZHJB 3ZHJB 3ZHJB Quanset hut Back door 3ZHJB	Leach/Purification	Foremans Office	South wall	L14	3ZHQQ		20 lb ABC DRY CHEM cart-Op
ation Eimco Sump East of deep leg pit L18 3FZRV 3FZRV ation Southwest Leach-down S.W. of Leach tanks L2 3FZRY 3FZRZ ation Inside North door North of # 3 Leach Tank L3 3FZRZ ation East of Classiffer/Ball mill On pole by ramp L4 3FZRW Leach/Purification Northwest of Maint. Shack 3ZHPF 3ZHPG Leach/Purification Mounted to work bench 3ZHPF 3ZHPG Cadmium Mounted to work bench 3ZHHB 3ZHLB Cadmium Maintenance stea Northwest of welding booth 3ZHLB 3ZHLB Cellroom Maintenance area Northwest door 3ZHKG 3ZHKG Main Compressor Room Near West door 3ZHKG 3ZHKG Min Compressor Room Between #7 & 8 Air Control 3ZHKG 3ZHKG Quanset Hut Front door 3ZHKB 3ZHJB 3ZHJB Quanset hut Back door 3ZHJB 3ZHJB 3ZHJB Pump Shop By bulk oil drum	Leach/Purification	Press paper area	South	L15	3ZHQV		20 lb ABC DRY CHEM Cart-OF
ation Southwest Leach-down S.W. of Leach tanks L2 3FZRY 3FZRZ ation Inside North door North of # 3 Leach Tank L3 3FZSO 3FZRV ation East of Classifier/Ball mill On pole by ramp L4 3FZRW 3ZHPG ation Leach/Purification Northwest of Maint. Shack 3ZHPF 3ZHPG 3ZHPG Casting-Near back door Mounted to work bench 3ZHHR 3ZHHR 3ZHHB 3ZHHB Cadmium Maintenance shop 3ZHHR 3ZHHR 3ZHHR 3ZHHR Cadmium Northwest door 3ZHKP 3ZHKQ 3ZHKQ Gass pumps Near West side 3ZHKS 3ZHKG Oil house North side 3ZHKS 3ZHKG Oil house South side 3ZHKS 3ZHKS Quanset Hut Front door 3ZHG 3ZHG Quanset hut Center 3ZHJB 3ZHJB Pump Shop By bulk oil drum 3ZHJB 3ZHNB By parts wash M27	Leach/Purification	Eimco Sump	East of deep leg pit		3FZRV	3FZRT	and the second s
ation Inside North door North of # 3 Leach Tank L3 3FZSO ation East of Classifier/Ball mill On pole by ramp L4 3FZRW ation Leach/Purification Northwest of Maint. Shack 3ZHPF 3ZHPG Casting-Near back door Mounted to work bench 3ZHJB 3ZHJB 3ZHJB Cadmium Maintenance shop 3ZHKB 3ZHKB 3ZHKG Cadmium Maintenance area Northwest of welding booth 3ZHKB 3ZHKB Gas pumps Near West side 3ZHKB 3ZHKG Main Compressor Room Between #7 & 8 Air Control 3ZHK3 3ZHK6 Min Compressor Room North side 3ZHKB 3ZHKB Oil house South side 3ZHKB 3ZHKB Quanset Hut Front door 3ZHJB 3ZHJB Quanset hut Center 3ZHJB 3ZHJB Quanted hut Back door 3ZHJB 3ZHJB AUD 3ZHJB 3ZHJB 3ZHJB Pump Shop By parts wash	Leach/Purification	Southwest Leach-down	S.W. of Leach tanks		3FZRY	3FZRZ	LANCE CONTRACTOR OF THE PROPERTY OF THE PROPER
ation East of Classifier/Ball mill On pole by ramp L4 3FZRW Leach/Purification Northwest of Maint. Shack 3ZHPF 3ZHPG Casting-Near back door Mounted to work bench 3ZHJB 3ZHJG Cadmium Maintenance shop 3ZHHR 3ZHHS Cellroom Maintenance area Northwest of welding booth 3ZHKP 3ZHKG Gas pumps Northwest door 3ZHKP 3ZHKG Main Compressor Room Near West door 3ZHKS 3ZHKG Main Compressor Room North side 3ZHK3 3ZHK6 Oil house South side 3ZHK3 3ZHK8 Oil house South side 3ZHK9 3ZHKB Quanset Hut Front door 3ZHJ4 3ZHJ5 Quanset hut Center 3ZHJ6 3ZHJ6 3ZHJ6 Vehicle Shop By bulk oil drum 3ZHJ8 3ZHJ9 Pump Shop By parts wash M27 3ZHMW 3ZHNS CRNE AP308 CP5 3ZHMS 3ZHNS 3ZHNS	Leach/Purification	Inside North door	North of # 3 Leach Tank	L3	3FZSO	100	
Leach/Purification Northwest of Maint. Shack 3ZHPF 3ZHPG Casting-Near back door Mounted to work bench 3ZHJB 3ZHJB 3ZHJB Cadmium Maintenance shop 3ZHHR 3ZHHR 3ZHHS Cellroom Maintenance area Northwest of welding booth 3ZHKB 3ZHKG Gas pumps Near West side 3ZHKB 3ZHKG Main Compressor Room Near West door 3ZHK3 3ZHKG Main Compressor Room Between #7 & 8 Air Control 3ZHK3 3ZHK6 Oil house South side 3ZHK3 3ZHK8 Oil house South side 3ZHK9 3ZHK8 Quanset Hut Front door 3ZHJ6 3ZHJ6 3ZHJ8 Quanset hut Back door 3ZHJ8 3ZHJ8 3ZHJ8 Vehicle Shop By bulk oil drum 3ZHJ8 3ZHJ8 3ZHJ8 Pump Shop By parts wash M27 3ZHND 3ZHNS SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Leach/Purification	East of Classifier/Ball mill	On pole by ramp		3FZRW		
Casting-Near back door Mounted to work bench 3ZHJB 3ZHJC Cadmium Maintenance shop 3ZHHR 3ZHHR Cellroom Maintenance area Northwest of welding booth 3ZHLB 3ZHLC Cellroom Maintenance area Northwest of welding booth 3ZHKP 3ZHKQ Main Compressor Room Near West door 3ZHK5 3ZHKG Main Compressor Room Between #7 & 8 Air Control 3ZHK3 3ZHK3 Oil house North side 3ZHK7 3ZHK8 Oil house South side 3ZHK9 3ZHK8 Quanset Hut Front door 3ZHK9 3ZHKB Quanset hut Center 3ZHJ6 3ZHJ6 3ZHJ8 Vehicle Shop By bulk oil drum 3ZHN4 3ZHN5 Pump Shop By parts wash M27 3ZHND 3ZHNF CRNE AP308 CP5 3ZHNG 3ZHNG 3ZHNS SW Pole East of hand wash area M24 3ZHNG 3ZHN7	Maintenance	Leach/Purification	Northwest of Maint. Shack		3ZHPF		20 Ib ABC DRY CHEM
Cadmitum Maintenance shop 3ZHHR 3ZHHS Cellroom Maintenance area Northwest of welding booth 3ZHLB 3ZHLC Gas pumps west side 3ZHKP 3ZHKQ Main Compressor Room Near West door 3ZHK5 3ZHK6 Main Compressor Room Between #7 & 8 Air Control 3ZHK3 3ZHK3 Oil house North side 3ZHK7 3ZHK8 Oil house South side 3ZHK9 3ZHK8 Quanset Hut Front door 3ZHJ4 3ZHJ5 Quanset hut Center 3ZHJ6 3ZHJ8 3ZHJ7 Vehicle Shop By bulk oil drum 3ZHJ8 3ZHJ9 Pump Shop By parts wash M27 3ZHMV 3ZHNF CRNE AP308 CP5 3ZHN6 3ZHN6 3ZHN7 SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Casting-Near back door	Mounted to work bench		3ZHJB		20 lb ABC DRY CHEM Cart-Op
Cellroom Maintenance area Northwest of welding booth 3ZHLB 3ZHLC Gas pumps west side 3ZHKP 3ZHKQ Main Compressor Room Near West door 3ZHK5 3ZHK6 Main Compressor Room Between #7 & 8 Air Control 3ZHK3 3ZHK6 Oil house North side 3ZHK7 3ZHK8 Oil house South side 3ZHK9 3ZHK9 3ZHKB Quanset Hut Front door 3ZHJ4 3ZHJ5 3ZHJ5 Quanset hut Center 3ZHJ8 3ZHJ8 3ZHJ5 Vehicle Shop By bulk oil drum M27 3ZHND 3ZHNF Pump Shop By parts wash M27 3ZHMV 3ZHMX CRNE AP308 CP5 3ZHMS 3ZHMS 3ZHMX SW Pole East of hand wash area M24 3ZHMS 3ZHMX	Maintenance	Cadmium	Maintenance shop		3ZHHR		5 lb ABC DRY CHEM Cart-OP
Gas pumps west side 3ZHKP 3ZHKQ Main Compressor Room Near West door 3ZHK5 3ZHK6 Main Compressor Room Between #7 & 8 Air Control 3ZHK3 3ZHK4 Oil house North side 3ZHK7 3ZHK8 Oil house South side 3ZHK9 3ZHK9 3ZHKB Quanset Hut Front door 3ZHJ4 3ZHJ5 Quanset hut Center 3ZHJ8 3ZHJ8 3ZHJ9 Vehicle Shop By bulk oil drum 3ZHNA 3ZHN5 Pump Shop By parts wash M27 3ZHMV 3ZHNF CRNE AP308 CP5 3ZHNG 3ZHMX 3ZHMX SW Pole East of hand wash area M24 3ZHNG 3ZHN7	Maintenance	Cellroom Maintenance area	Northwest of welding booth	į	3ZHLB		20 lb ABC DRY CHEM Cart-Op
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Main Compressor Room Between #7 & 8 Air Control 3ZHK3 3ZHK4 Oil house North side 3ZHK7 3ZHK8 Oil house South side 3ZHK9 3ZHK8 Quanset Hut Front door 3ZHJ4 3ZHJ5 Quanset hut Center 3ZHJ6 3ZHJ8 3ZHJ7 Quanset hut Back door 3ZHJ8 3ZHJ8 3ZHJ9 Vehicle Shop By bulk oil drum 3ZHN4 3ZHN5 Pump Shop By parts wash M27 3ZHMD 3ZHNF CRNE AP308 CP5 3ZHM 3ZHMX 3ZHMX SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Main Compressor Room	Near West door		3ZHK5		20 lb Carbon Dioxide
Oil house North side 3ZHK7 3ZHK8 Oil house South side 3ZHK9 3ZHKB Quanset Hut Front door 3ZHJ4 3ZHJ5 Quanset hut Center 3ZHJ6 3ZHJ6 3ZHJ7 Quanset hut Back door 3ZHJ8 3ZHJ8 3ZHJ9 Vehicle Shop By bulk oil drum 3ZHNA 3ZHND 3ZHNF Pump Shop By parts wash M27 3ZHND 3ZHNF CRNE AP308 CP5 3ZHNG 3ZHNS 3ZHNS SW Pole East of hand wash area M24 3ZHNG 3ZHN7	Maintenance	Main Compressor Room	Qο		3ZHK3		20 lb ABC DRY CHEM Cart-Op
Oil house South side 3ZHK9 3ZHKB Quanset Hut Front door 3ZHJ4 3ZHJ5 Quanset hut Center 3ZHJ6 3ZHJ6 3ZHJ7 Quanset hut Back door 3ZHJ8 3ZHJ8 3ZHJ9 Vehicle Shop By bulk oil drum 3ZHN4 3ZHN5 Pump Shop By parts wash M27 3ZHND 3ZHNF CRNE AP308 CP5 3ZHMW 3ZHMX 3ZHMX SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Oil house	North side		3ZHK7		20 Ib ABC DRY CHEM
Quanset Hut Front door 3ZHJ4 3ZHJ5 Quanset hut Center 3ZHJ6 3ZHJ6 3ZHJ7 Quanset hut Back door 3ZHJ8 3ZHJ9 Vehicle Shop By bulk oil drum 3ZHN4 3ZHN5 Pump Shop By parts wash M27 3ZHND 3ZHNF CRNE AP308 CP5 3ZHMV 3ZHMX 3ZHMX SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Oil house	South side		3ZHK9		20 lb ABC DRY CHEM Cart-Op
Quanset hut Center 3ZHJ6 3ZHJ7 Quanset hut Back door 3ZHJ8 3ZHJ9 Vehicle Shop By bulk oil drum 3ZHN4 3ZHN5 Pump Shop By parts wash M27 3ZHND 3ZHNF CRNE AP308 CP5 3ZHMV 3ZHMX 3ZHMX SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Quanset Hut	Front door		3ZHJ4	3ZHJ5	20 lb ABC DRY CHEM Cart-Op
Quanset hut Back door 3ZHJ8 3ZHJ9 Vehicle Shop By bulk oil drum 3ZHN4 3ZHN5 Pump Shop By parts wash M27 3ZHND 3ZHNF CRNE AP308 CP5 3ZHMW 3ZHMX 3ZHNS SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Quanset hut	Center		3ZHJ6	3ZHJ7	20 lb ABC DRY CHEM Cart-Op
Vehicle Shop By bulk oil drum 3ZHN4 3ZHN5 Pump Shop By parts wash M27 3ZHND 3ZHNF CRNE AP308 CP5 3ZHMW 3ZHMW 3ZHMX SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Quanset hut	Back door		3ZHJ8	3ZНJ9	20 lb ABC DRY CHEM Cart-Op
Pump Shop By parts wash M27 3ZHND 3ZHNF CRNE AP308 CP5 3ZHMW 3ZHMX 3ZHMX SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Vehicle Shop	By bulk oil drum		3ZHN4	3ZHN5	15 lb Carbon Dioxide
CRNE AP308 CP5 3ZHMW 3ZHMX SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	Pump Shop	By parts wash	M27	3ZHND	3ZHNF	15 lb Carbon Dioxide
SW Pole East of hand wash area M24 3ZHN6 3ZHN7	Maintenance	CRNE AP308	CP5		3ZHMW	3ZHMX	2.5 ABC DRY CHEM
	Maintenance	SW Pole	East of hand wash area	M24	3ZHN6	3ZHN7	20 lb ABC DRY CHEM Cart-OP

Welding Shop	7TOA OTMENT		l ocation 2	BRZ#	B/C UNIT	B/C SITE	E
Welding Shop Near South door M26 3ZHNB 3ZHNC Instrument Shop South wall 3ZHNJ 3ZHCJ	Maintenance	Vehicle Shop	South door	M25	3ZHN8	3ZHN9	20 lb ABC DRY CHEM Cart-Op
Instrument Shop	Maintenance	Welding Shop	Near South door	M26	3ZHNB	3ZHNC	20 lb ABC DRY CHEM Cart-Op
Crane CP1 Drott Go-Devil 3ZHNO 3ZHNO 3ZHNI Crane 2 3ZHMZ 3ZHMI 3ZHNI	Maintenance	Instrument Shop	South wall		3ZHNJ	3ZHNK	20 lb ABC DRY CHEM Cart-Op
Crane 2 ZYHMY 3ZHMY 3ZHMY 3ZHMZ Cart CS7 Northwest Corner 3ZHNZ 3ZHNZ 3ZHNZ 3ZHNI 3ZHC 3ZHC 3ZHC 3ZHC 3ZHC 3ZHC 3ZHC	Maintenance	Crane CP1	Drott Go-Devil			3ZHN1	5 Ib ABC DRY CHEM
Cart CS7 Aorthose Monthwest Corner 3ZHNZ 3ZHNM 3ZHNG 3ZHNM 3ZHNG 3ZHC 3ZHC 3ZHC 3ZHC 3ZHC 3ZHC 3ZHC 3ZHC	Maintenance	Crane 2	Line Long Long Long Long Long Long Long Long		ļ	3ZHMZ	5 lb ABC DRY CHEM Cart-Op
Office Northwest Corner 3ZHNL 3ZHNL Near north wall on workbench West of horrizontal mill 3ZHNG 3ZHNG 3ZHNG A Roast/Acid maint shack Inside on collumn 3ZHNG 3ZHNG 3ZHNG By Maint 3ZHBS 3ZHBS 3ZHBS 3ZHBS 3ZHBS N By Siteps WT Vaccum pump at steps R17 3ZHBS 3ZHBS 3ZHBS Conveyor ZHG 3ZHG 3ZHBS 3ZHG 3ZHG Conveyor ZHG 3ZHG 3ZHG 3ZHG 3ZHG 3ZHG Line Cater ZHG 3ZHG	Maintenance	Cart CS7				3ZHN3	5 lb ABC DRY CHEM Cart-Op
ce Near north wall on workbench West of horrizontal mill 3ZHNG 3ZHNG 3ZHNG 3ZHNG 3ZHNG 3ZHNG 3ZHNG 3ZHNG 3ZHCG 3ZHCG<	Maintenance	Office	Northwest Corner		3ZHNL	3ZHNM	5 lb ABC DRY CHEM Cart-OP
ce Roast/Acid maint shack Inside on column 3ZHCF 3ZHCG By Maint. 3ZHBS 3ZHBS 3ZHBS 3ZHBS N By Sieps WT Vaccum pump at steps R31 3ZHBS 3ZHBY N By Sieps O/I House R17 3ZHBY 3ZHBY Conveyor 3ZHBY 3ZHBY 3ZHBY Conveyor 3ZHBY 3ZHBY 3ZHBY Line Control room 3ZHC3 3ZHC3 3ZHC3 By Hopper 2 3ZHC3 3ZHC3 3ZHC4 Line Control Room 3ZHC3 3ZHC4 3ZHC3 3ZHC6 Line East 2 3ZHC7 3ZHC8 3ZHC6 3ZHC6 Line East 3 3ZHC7 3ZHC6 3ZHC6 3ZHC6 3ZHC6 Line East 4 2 3ZHC7 3ZHC8 3ZHC8 3ZHC8 Line Control Room 4 2 3ZHC7 3ZHC8 3ZHC8 3ZHC8 3ZHC8 By station Froom 4 2 3ZHC7 </td <td>Maintenance</td> <td>Near north wall on workbench</td> <td></td> <td></td> <td>3ZHNG</td> <td>3ZHNH</td> <td>30 lb Class D Cart-Op</td>	Maintenance	Near north wall on workbench			3ZHNG	3ZHNH	30 lb Class D Cart-Op
By Maint. WT Vaccum pump at steps R31 3ZHBX 3ZHBY N By Sieps WT Vaccum pump at steps R31 3ZHBX 3ZHBY O/S Oil HS Oil House R17 3ZHCH 3ZHBV Conveyor ZHBY 3ZHBW 3ZHBW 3ZHBW Conveyor ZHBY 3ZHBW 3ZHBW 3ZHBW Control room ZHBS 3ZHCO 3ZHCO 3ZHCO Line Control room ZHCG 3ZHCA 3ZHCA 3ZHCA 3ZHCB Line East ZHCD ZHCB 3ZHCC 3ZHCC 3ZHCB 3ZHCA 3ZHCA 3ZHCB 3ZHNN 3ZHNN 3ZHNN 3ZHNN 3ZHNN 3ZHNN 3ZHNN 3Z	Maintenance	Roast/Acid maint shack	Inside on column		3ZHCF	зхнсс	15 lb Carbon Dioxide
N By Steps WT Vaccum pump at steps R31 3ZHBX 3ZHBY O/S Oil HS Oil House R17 3ZHCH 3ZHCJ Conveyor 3ZHCJ 3ZHCJ 3ZHCJ 3ZHCJ Conveyor 3ZHCA 3ZHCO 3ZHCO 3ZHCA By Hopper 23ZHCS 3ZHCS 3ZHCS 3ZHCS Line Cater 24 3ZHCS 3ZHCS 3ZHCS 3ZHCS Line Cater 25 3ZHCS 3ZHCS 3ZHCS 3ZHCS 3ZHCS By sub # Arcid Control Room 25 3ZHNX 3ZHNX 3ZHNX 3ZHNX By Store room 25 3ZHCY 3ZHCY 3ZHCN 3ZHCY By Store room 25 3ZHCY 3	Pre-Leach	By Maint.	10000 1000 1000 1000 1000 1000 1000 10		3ZHBS	3ZHBT	15 lb Carbon Dioxide
O/S Oil HS Oil House R17 3ZHCH 3ZHCJ Conveyor Conveyor 3ZHBW 3ZHBW 3ZHBW Pump room Basement Pump room Basement 3ZHBZ 3ZHCO By Hopper 3ZHCG 3ZHCG 3ZHCG By Hopper 2ZHCG 3ZHCG 3ZHCG Line Cnter 2ZHCG 3ZHCG 3ZHCG Line East 2ZHCG 3ZHCG 3ZHCG Line East 2ZHCG 3ZHCG 3ZHCG Pump House East of Pre heater on Post R3 3ZHCC 3ZHCC Pump House East of Pre heater on Post R3 3ZHCC 3ZHCC Pump House East pole R21 3ZHCC 3ZHCC By sub #7 Control room R21 3ZHCC 3ZHCC By sub #7 Control room R21 3ZHCC 3ZHCC Store room Southwest Corner R21 3ZHNX 3ZHNY g Store room East pole R22 3ZHCX 3ZHCY	Pre-Leach	N By Steps	WT Vaccum pump at steps	R31	,	3ZHBY	15 lb Carbon Dioxide
Conveyor 3ZHBV 3ZHBV 3ZHBW Pump room Basement 9 3ZHBZ 3ZHCO 3ZHBZ 3ZHCO By Hopper 2 3ZHCG 3ZHCG 3ZHCG 3ZHCG 3ZHCG Line Cnter 2 3ZHCG 3ZHCC 3ZHNX 3ZH	Pre-Leach	O/S OII HS	Oil House	R17		3ZHCJ	20 lb ABC DRY CHEM
Pump room Basement 3ZHBZ 3ZHCO By Hopper 3ZHCA 3ZHCA 3ZHCA Line Cnter 3ZHCA 3ZHCB 3ZHCB 3ZHCB 3ZHCB Line East 2ZHCF 3ZHCC 3ZHCC 3ZHCC 3ZHCB Line East 2ZHCF 3ZHCC 3ZHCC 3ZHCC 3ZHCC 3ZHCC Line East 3ZHCF 3ZHCC 3ZHNX 3ZHNX <td>Pre-Leach</td> <td>Conveyor</td> <td></td> <td></td> <td>3ZHBV</td> <td>3ZHBW</td> <td>20 lb ABC DRY CHEM Cart -OP</td>	Pre-Leach	Conveyor			3ZHBV	3ZHBW	20 lb ABC DRY CHEM Cart -OP
By Hopper 3ZHC3 3ZHC4 Line Cnter	Pre-Leach	Pump room Basement			3ZHBZ	3ZHCO	20 lb ABC DRY CHEM Can-Up
Line Cnter Line East 3ZHC5 3ZHC6 Line East Line East 3ZHC7 3ZHC8 Pump House 2ZHC7 3ZHCB 3ZHCC 3ZHCC By sub # 7 East of Pre heater on Post R33 3ZHCK 3ZHCL Control room Control room R21 3ZHC1 3ZHC1 Store room Southwest Corner S3 3ZHNS 3ZHNY Store room West pole S2 3ZHNY 3ZHNY Store room West pole S2 3ZHNY 3ZHNY Store room East pole S2 3ZHNY 3ZHNY Acid control Room R20 3ZHCT 3ZHCQ Acid plant Acid Control Room-Suth R18 3ZHDA 3ZHDA Sub Station # 7 Motor Control Room-Suth R18 </td <td>Pre-Leach</td> <td>Ву Норрег</td> <td>List the state of the state of</td> <td></td> <td>3ZHC3</td> <td>3ZHC4</td> <td>20 lb ABC DRY CHEM Cart-Op</td>	Pre-Leach	Ву Норрег	List the state of		3ZHC3	3ZHC4	20 lb ABC DRY CHEM Cart-Op
Line East Line East AZHC7 3ZHC8 Pump House East of Pre heater on Post 3ZHCC 3ZHCC 3ZHCD By sub # 7 East of Pre heater on Post R33 3ZHCK 3ZHCL Control room Control room R21 3ZHC1 3ZHC1 Store room Southwest Corner S3 3ZHNS 3ZHNV Store room West pole S2 3ZHNV 3ZHNV Store room East pole S2 3ZHNV 3ZHNV Acid Control Room R2 3ZHCT 3ZHCV Acid plant Acid Control Room-Suth R19 3ZHCM 3ZHCN SE Substation #7 Motor Control Room-Suth R16 3ZHDB 3ZHDB Sub Station #7 <td>Pre-Leach</td> <td>Line Cnter</td> <td></td> <td>1</td> <td>3ZHC5</td> <td>3ZHC6</td> <td>20 lb ABC DRY CHEM Cart-Op</td>	Pre-Leach	Line Cnter		1	3ZHC5	3ZHC6	20 lb ABC DRY CHEM Cart-Op
Pump House By sub # 7 East of Pre heater on Post R33 3ZHCC 3ZHCL Control room Control room R33 3ZHCK 3ZHCL 3ZHCL Store room Store room Southwest Corner S3 3ZHNS 3ZHNY Store room West pole S2 3ZHNX 3ZHNY Store room East pole S2 3ZHNX 3ZHNY Hallway East pole S2 3ZHNX 3ZHNY Acid plant Conc. Storage center R2 3ZHC 3ZHCN Acid Control Room Acid Control Room-east R19 3ZHCM 3ZHCN SE Substation # 7 Motor Control Room-east R16 3ZHDB 3ZHDB Sub Station # 7 Motor Confrol Room-West R16 3ZHDB 3ZHDB SubStation # 7 Substation 7 R3 3ZHDB 3ZHDB Roaster East Stair Hoist house 5th R3 3ZHCR 3ZHDB Ore Shed North Conc. Storage north R3 3ZHCR 3ZHCS	Pre-Leach	Line East			3ZHC7	3ZHC8	20 lb ABC DRY CHEM CartOp
By sub # 7 East of Pre heater on Post R33 3ZHCK 3ZHCL Control room Control room R21 3ZHC1 3ZHC2 Store room Store room Southwest Corner S3 3ZHNS 3ZHNT Store room Least pole S2 3ZHNX 3ZHNY Store room East pole S2 3ZHNX 3ZHNY Hallway Conc. Storage center R2 3ZHC7 3ZHCY Acid plant Conc. Storage center R2 3ZHCP 3ZHCQ Acid Control Room Acid Control Room-east R19 3ZHCM 3ZHCN SE Substation #7 Motor Control Room-east R15 3ZHDB 3ZHDB Sub Station #7 Motor Control Room-South R18 3ZHDB 3ZHDB Sub Station #7 Substation 7 R3 3ZHDB 3ZHDB Roaster East Stair Hoist house 5th R3 3ZHDC 3ZHDB Ore Shed North Conc. Storage north R3 3ZHCR 3ZHDB	Pre-Leach	Pump House	A Company		3ZHCC	3ZHCD	20 lb ABC DRY CHEM Cart-Up
Control room Control room R21 3ZHC1 3ZHC2 Store room Store room West pole S3 3ZHNS 3ZHNV Store room West pole S2 3ZHNV 3ZHNV Store room East pole S2 3ZHNV 3ZHNV Hallway Between restrooms S2 3ZHNX 3ZHNY Acid plant Conc. Storage center R2 3ZHCT 3ZHCV Acid Control Room Acid Control Room-east R19 3ZHCM 3ZHCN SE Substation Motor Control Room-east R15 3ZHDA 3ZHDB Sub Station # 7 Motor Control Room-West R16 3ZHDB 3ZHDC Sub Station # 7 Motor Control Room-West R16 3ZHDB 3ZHDB Roaster Satir Substation 7 R3 3ZHDD 3ZHDR Roaster East Stair Hoist house 5th R5 3ZHCS 3ZHCS Ore Shed North Conc. Storage north R3 3ZHCS 3ZHCS	Pre-Leach	By sub # 7	East of Pre heater on Post	R33	3ZHCK	3ZHCL	20 lb ABC DRY CHEM Cart-Op
Store room Southwest Corner S3 3ZHNS 3ZHNT Store room West pole S2 3ZHNV 3ZHNW Store room East pole S2 3ZHNX 3ZHNV Hallway Between restrooms S2 3ZHNQ 3ZHNY In Ore shed - Center Conc. Storage center R2 3ZHQ 3ZHQ Acid plant Acid Control R2 3ZHQ 3ZHQ Acid Control Room R2 3ZHQ 3ZHQ SE Substation Motor Control Room-east R15 3ZHD4 3ZHD5 Sub Station #7 Motor Control Room-South R16 3ZHDB 3ZHD6 Sub Station #7 Substation 7 R3 3ZHDB 3ZHDF Roaster East Stair Substation 7 R3 3ZHDQ 3ZHDR Roof Center Hoist house 5th R3 3ZHCS 3ZHCS	Pre-Leach	Control room	Control room	R21	3ZHC1	3ZHC2	20 lb Carbon Dioxide
Store room West pole S2 3ZHNV 3ZHNV Store room East pole 3ZHNX 3ZHNX 3ZHNY Hallway Between restrooms 3ZHNQ 3ZHNQ 3ZHNR Ore shed - Center Conc. Storage center R2 3ZHCQ 3ZHCV Acid plant Coolong Tower R20 3ZHCM 3ZHCN Acid Control Room R20 3ZHCM 3ZHCN SE Substation ROOM Motor Control Room-east R15 3ZHD4 3ZHD5 Sub Station #7 Motor Control Room-South R18 3ZHDB 3ZHDB Sub Station #7 Motor Control Room-West R16 3ZHDB 3ZHDC Roaster East Stair Substation 7 R34 3ZHDD 3ZHDR Roof Center Hoist house 5th R5 3ZHCS 3ZHCS Ore Shed North Conc. Storage north R3 3ZHCR 3ZHCS	Purchasing	Store room	Southwest Corner	S3	3ZHNS	3ZHNT	20 lb ABC DRY CHEM Cart-Op
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Hallway Between restrooms 3ZHNQ 3ZHNR Ore shed - Center Conc. Storage center R2 3ZHCT 3ZHCV Acid plant Coolong Tower R20 3ZHCP 3ZHCQ Acid Control Room Acid Control R19 3ZHCM 3ZHCN SE Substation Motor Control Room-east R15 3ZHD4 3ZHD5 Elect Room SW Motor Control Room-South R18 3ZHD8 3ZHD9 Sub Station #7 Motor Control Room-West R16 3ZHDB 3ZHDC Sub Station #7 Substation 7 R3 3ZHDL 3ZHDM Roaster Southeast Substation 7 R3 3ZHDQ 3ZHDM Roaster East Stair Hoist house 5th R5 3ZHCS 3ZHCS Ore Shed North Conc. Storage north R3 3ZHCR 3ZHCS	Purchasing	Store room	East pole		3ZHNX	3ZHNY	20 lb ABC DRY CHEM Cart-Op
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20 lb ABC DRY CHEM Cart_op	3ZHRC	3ZHR6			Safety Storage	Spare
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5 IN ABC DRY CHEM	SYHZO	32HV1	מַ מַ	S wall in hall/salary side	Womens locker room	Security
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15 lb Carbon Dioxide	3ZHP4	3ZHP3	S10	Dirty side E wall by coat rack	Mens Locker room	Security
20 Ib ABC DRY CHEM	3ZHKV	3ZHKT	809	South wall by light switch	Lunchroom	Security
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20lb Carbon Dioxide		W-878545		Sludge Pad Sump	Spill Kit(Hazardous Waste)	Roast/Acid
15 lb Carbon Dioxide	3ZHRT	3ZHRS		Sludge Pad Sump	Spill Kit(Hazardous Waste)	Roast/Acid
5 Ib ABC DRY CHEM	3ZHCB	3ZHC9	R36	Foremans office	Foremans Office	Roast/Acid
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20 lb ABC DRY CHEM Cart-Op	3ZHDY	3ZHDX			By Hoppers	Roast/Acid
20 lb ABC DRY CHEM Cart-OP	3ZHDW	3ZHDV	R8	Roaster 3rd floor-west	Roaster SW	Roast/Acid
20 lb ABC DRY CHEM Cart-OP	3ZHDT	3ZHDS	R9	Roaster 3rd floor-east	Roaster SE	Roast/Acid
20 lb ABC DRY CHEM Cart-Op	3ZHDP	3ZHDN			Roaster Center	Roast/Acid
20 lb ABC DRY CHEM Cart-Op	3ZHDK	3ZHDJ	R13	Roaster 2nd Flr mid-West	Roaster SW	Roast/Acid
20 lb ABC DRY CHEM Cart-Op	3ZHDH	3ZHDG	R35	Air Compressor Building	Roaster West Stairs	Roast/Acid
20 lb ABC DRY CHEM Cart-Op	3ZHD7	3ZHD6	R14		Roaster North	Roast/Acid
20 lb ABC DRY CHEM Cart-OP	3ZHD3	3ZHD2	R27			Roast/Acid
20 lb ABC DRY CHEM Cart-Op	3ZHD1	3ZHDO	R26	Conc. Unloading E	Ore Shed Train Dock SW	Roast/Acid
20 lb ABC DRY CHEM Cart-OP	3ZHCZ	зzнсү	R25	Conc. unloading SW		Roast/Acid
20 lb ABC DRY CHEM Cart-OP	3ZHCX	3ZHCW	R1	Conc. Storage South	Ore Shed South	Roast/Acid
TYPE	B/C SITE	B/C UNIT	BRZ#	Location 2	LOCATION	DEPARTMENT
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Table 3
Fire Extinguisher Locations
Big River Zinc Corporation
Sauget, Illinois

DEPARTMENT	LOCATION	Location 2	BRZ#	B/C UNIT	B/C SITE	TYPE
Spare	Safety Storage	***************************************		3ZHRB	3ZHRC	20 lb BC DRY CHEM Cart-Op
Spare	Safety Storage	- NAME OF THE PARTY OF THE PART		3ZHRD	3ZHRF	30 lb Class D Cart-Op
Spare	Safety Storage	The second secon		3ZHRG	3ZHRH	17 lb Halon 1211
Profes	Safety Storage			3ZHRQ	3ZHRR	2.5 Gallon Pressurized Water
Opera o	Safety Storage			3ZHR8	3ZHRC	20 lb ABC DRY CHEM Cart-Op
P C	Safaty Storage			3ZHRL	3ZHRM	5 Ib ABC DRY CHEM
1 0		Dy the property of		37HKK	37HK	20 lb Carbon Dioxide
lest Plant	Filot bay	Dy (diapriorid		Charles		
Test Plant	Annex	By East door		3ZHKC	3ZHKD	20 Ib ABC DRY CHEM
Teet Dlant	Zinc Dowder			3ZHKF	3ZHKG	20 Ib ABC DRY CHEM
169() (2016	and C. Credon			אטטעא	3746	A F ABO DOY OUT OF DO
Test Plant	Office	By Restroom		3ZHKM	3ZHKN	5 IS ABC DRY CHEM Can-OF
Test Plant	Zinc Powder	Platform		3ZHKH	3ZHKJ	30 lb Class D Cart-Op

BIG RIVER ZINC CORPORATION

2401 MISSISSIPPI AVENUE SAUGET, ILLINOIS 62201-1078

TEL: 618-274-5000 FAX: 618-274-4444

February 13, 2008

Mr. Todd Brown U.S. EPA Region 5 77 West Jackson Boulevard, LR-8J Chicago, Illinois 60604

Mr. Brown:

Please consider this correspondence as a response to the January 17, 2007 Notice of Violation received by Big River Zinc.

Regarding your allegation that Big River was "engaged in storing hazardous waste without a permit", we ask you to consider these facts:

1. The debris generated from the demolition of the leach building was sampled and analyzed by TCLP method to determine its ultimate disposal status. Not all was, of course, determined to be hazardous, so as test results of areas (piles) came back, they were labeled if they were in fact hazardous, and segregated for timely disposal. The area they were staged in was, in fact the same area where all concentrates were historically brought into the plant. The concrete and wood debris leaving as hazardous waste needed to be crushed to meet landfill specifications, so it could not be staged in the leach area due to the demolition activities. In your narrative of the BRZ inspection, you noted the concentrate pad "drains into a holding pond_associated with BRZ's waste water treatment system". For the record there is no longer a holding pond, there is a holding tank. The concentrate pad is at a lower elevation than the storm water tank, so any run off from the piles would be contained, and have to be pumped in order to leave the concentrate pad. This is why we at BRZ feel we were in compliance with handling the material until it left as a manifested hazardous waste.

You noted in your report that signs were in place designating those materials that were hazardous, the date they were staged and a date 90 days later. All of these materials were disposed of in less than 90 days from the time they became known as hazardous until they were properly land filled. Attachment "A" contains documentation of the hazardous waste pile removal along with copies of the hazardous waste manifests and certificates of disposal.

- 2. BRZ's Hazardous Waste Contingency Plan has been reviewed for completeness and accuracy to ensure compliance with applicable Federal and State regulations. After review it was determined some items were not as easily accessible as they could have been, so the decision was made to revise and reissue the Plan. We will forward a copy of the old plan and the new issue to you for your review no later than 31 March, 2008.
- 3. The NOV claims that Big River Zinc did not have a written description of the type and amount of training given at Big River Zinc. At this time, absent a production work force, BRZ still maintains four employees who are current on HM Transportation Management and Hazardous Waste Management as documented in Attachment "B." These certificates show what type of training was involved and when it occurred. Training certificates showing the type of training and time of training for all the contractor personnel working on the demolition occurring at Big River Zinc at the time were displayed for the inspector.

Before the plant ceased operation, Big River Zinc conducted training using the contingency plan, memos and procedures written for the training. The records for this training were displayed for the inspector. This training will be more formalized for use in training Big River Zinc employees when they return to work and thereafter. A copy of the revised training program will be sent along with the revised Contingency Plan.

Big River Zinc had conducted annual HM181 training for those Supervisors who supervise the handling of hazardous material and any workers who handle hazardous material, although documents concerning this training were not presented to the inspector during the inspection.

We believe this meets the intent of 40CFR262.34(a)(iv) and 40CFR265.16.

4. Inspection of the Universal Waste Storage Building found a number of fluorescent tubes that had not been placed in shipping containers and marked as Universal Waste Lamps. Most of these lamps were removed from the Leach building prior to demolition to keep them out of the waste debris stream. Our thought process was to isolate them in this properly designated area until they could be properly disposed of by a licensed disposal facility. The same can be said of the waste batteries that were not labeled as universal waste; they were removed from old electric carts that were being scrapped, and placed in the universal waste storage building awaiting pick up by a licensed recycler. No other material resided in the Universal Waste Storage Building except Universal Waste. Attachment "C" shows the manifests for the shipment of the lamps and the batteries.

If you require additional information, please don't hesitate to contact me at 618.274.5000 extension 194, or email me at maltepeter@bigriverzinc.com.

Regards:

Michael Altepeter

Environmental Manager

Big River Zinc Corp.

ATTACHMENT "A"

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This certificate is to verify the wastes specified on Manifest # OOZ774351751 have been properly disposed of in accordance with all local, state and federal regulations. "Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

AAdvacia

FACILITY NAME: (Pleuse check one)

Michigan Disposal Waste Treatment Plant (EPA LD. & MID000724831)

Wayne Disposal, Inc. (EPA I.D. / MID048090633)

ADDRESS:

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49350 N. 1-94 Service Drive Belleville, Michigan 48111

PHONE NUMBER:

1-800-592-5489

FAX NUMBER:

Alkona

1-800-593-5329

Authorized Signature:

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THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

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CERTIFICATE OF D.

FAX NUMBER:

Authorized Signature:

This certificate is to verify the wastes specified on Manifest # 00277435351 have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: (Please theck one)	
Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)	
Wayne (EPA LD	

Wayne Disposal, Inc

1-800-592-5489

PHONE NUMBER:

ADDRESS:

49350 N. I-94 Service Drive Belleville, Michigan 48111

1-800-593-5329

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. 1-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

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CERTIFICATE OF DISPOSAL

ADDRESS:

49350 N. I-94 Service Drive Belleville, Michigan 48111

This certificate is to verify the wastes specified on Manifest # 00 277475671K have been properly disposed of in accordance with all local, state and federal regulations "Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea

FACILITY NAME: (Please check one)	
Michigan Disposal Waste Treatment Plant (EPA1D. #MID000724831)	
Wayne Di	

7

Authorized Signature:

FAX NUMBER:

1-800-593-5329

PHONE NUMBER:

1-800-592-5489

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48 | 11

A MAY BE NORTH TO GENERATOR

5/4 7 Form Approved, OMB No. 2050-0039 002774355 JJK 2. Page 1 of 3. Emergency Response Phone 618-274-5000 1 5. Generator's Name and Mailing Address 816 REVER (1981) Generator's Site Address (if deferent then making addre 2441 NISSISSIPPI (#E 990EET, IL 622001 616 274-5666 Generator's Phone: U.S. EPA ID Number 6. Transporter 1 Company Name Beelman ILR000/35236 TIMEK 7. Transporter 2 Comp U.S. EPAID Number 8. Designated Facility Name and See Address MICHINAL DISPLEME, MASTE TREATMENT PLOST 约238 烟聚剂 I-外 空器IE 随I框 BRIEFRIE, WE ASSES | N | D 0 0 0 7 2 4 B 3 1 (884) 592-5489 Facility's Phone: Sq. Sh. U.S. BOT Description (including Proper Shipping Name, Hazard Class, ID Number, HM end Packing Group (if anyl) 19. Containers 12. Unit Wt./Vol. 13. Wasta Codes Quantity Type 1. HOZGEBUES MESTE, SQLID, A.Q.S., (CASSILIO, 9, MC2077, PGIII, Dock GENERATOR ENGO171, 950761101901 ومع دع 001 42400 P (FOR CONCRETE) A: 88761011001 Ď٠ 15. GENERATOR SIGNEFEROR'S CERTIFICATION: Thereby deciare that the contents of this coresignment are fully and accurately described above by the proper shipping name, and mention and baleholybicanded, and are in all respects in proper condition in transport according to applicable international and national governmental regulations. If exp Exported, I carify that the contents of this consignment conform to the terms of time attached EPA Actoroxicolognost of Consent.

I carify that the waste minimization statement identified in 40 CFR 252.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true anthony H. Anthony International Shipments 10 105 07 Thomas Import to U.S. Export from U.S. Port of entrylexat Date leaving U.S.: Transporter signature (for exports only): 17. Transporter Adignowledgment of Receipt of Materials Transporter 1 Printed/Typed Name 5747/3822 | 10| 05707 Eric Woltering Transporter 2 Printed Typed Hame 19. Вівстерапсу 18a. Discrepancy Indication Space Carantity Residue Partiel Resection Type Full Reaction Animartar en Havin Pint 18b. Alternate Facility (or Generator) Facility's Phone: 18a, Signature of Allemake Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., cuxtos for hazantous waste troubment desposable and reserva parameters. 17 20. Designated Facility Jenner or Operator, Cestification of Trace of Tracemon, materiary (2015)

EPA Form 8700-22 (Rev. 3-85). Previous earliers are posciete



FACILITY NAME:	Michigan Disposal Waste Treatment Plant (EPA 1.D. # MID000724831)	Wayne Disposal, Inc. (EPA I.D. / MIDO48090633)
ADDRESS:	49350 N. I-94 Service Drive Belleville, Michigan 48111	
PHONE NUMBER:	1-800-592-5489	
FAX NUMBER:	1-800-593-5329	
Authorized Signature:	a Man	

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

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CEKLIFICATE OF DISPOSAL

have been properly disposed of in accordance with all local, state and federal regulations. This certificate is to verify the wastes specified on Manifest # 2027743 54 354 "Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: (Please check one)

☐ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID00072481!)

Wayne Disposul, Inc (1974 I.D. # MID048090633)

ADDRESS:

49350 N. I-94 Service Drive Belleville, Michigan 48111

PHONE NUMBER:

1-800-592-5489

1-800-593-5329

FAX NUMBER:

Authorized Signature: 20 (P.)

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

PERSONALIZO EXCILITY TO GENERATOR

EPA Form 8700-22 (Rev. 3-05). Previous aditions are ibsolute

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This certificate is to verify the wastes specified on Manifest # OOスチテイスションゴビ have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: (Pleuse check one)

CI Michigan Disposal Waste Treatment Plant (EPALD, 8 MID00072831)

Wayne Disposal, Inc. (EPA 1 D. # MIDM#8040633)

ADDRESS:

49350 N. I-94 Service Drive Belleville, Michigan 48111

PHONE NUMBER:

1-800-592-5489

FAX NUMBER:

1-800-593-5329

Authorized Signature:

PORM1020 (3/96)

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This certificate is to verify the wastes specified on Manifest # OO 2 774 9 3 S P T T K have been properly disposed of in accordance with all local, state and federal regulations. "Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: (Please check one)

Michigan Disposal Waste Treatment Plant (EPA.LD.# MIDO00724831)

Wayne Disposal, Inc. (EPALD.# MIDURONAS)

ADDRESS:

49350 N. I-94 Service Drive Belleville, Michigan 48111

PHONE NUMBER:

1-800-592-5489

FAX NUMBER:

1-800-593-5329

Authorized Signature:

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THE ENVIRONMENTAL QUALITY COMPANY 49350 N. 1-94 SERVICE DRIVE BELLEVILLE MICHELAN

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DESIGNATED FACILITY TO GENERATOR

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CERTIFICATE OF DISPOSAL

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THE ENVIRONMENTAL QUALITY COMPANY 49350 N. 1-94 SERVICE DER

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FACILITY NAME: (Please check one)	Michigan Disposal Waste Treatment Plant (EPA LD. # MID000724831)	Wayne Disposal. In (EPALD) & MIDOMONGOS N.
ADDRESS:	49350 N. I-94 Service Drive Belleville, Michigan 48111	
PHONE NUMBER:	1-800-592-5489	
FAX NUMBER:	1-800-593-5329	
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have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

This certificate is to verify the wastes specified on Manifest # 000004000

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This certificate is to verify the wastes specified on Manifest # 00277472 55354 have been properly disposed of in accordance with all local, state and federal regulations. "Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: (Please check one)

Michigan Disposal Waste Treatment Plant (EPA I.D. # MID00/D4831)

Wayne Disposal, Inc. (EPA I.D. # MID048090633)

49350 N. I-94 Service Drive Belleville, Michigan 48111

ADDRESS:

PHONE NUMBER:

1-800-592-5489

FAX NUMBER:

1-800-593-5329

Authorized Signature:

BONMENTAL QUALITY COMPANY 49350 N. 1-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

Steven 7/02/3020

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OF DISPOSAL CATE

ADDRESS:

This certificate is to verify the wastes specified on Manifest # OO2774 マくく ゴコド have been properly disposed of in accordance with all local, state and federal regulations. "Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et sea.

FACILITY NAME: (Please theck one)

Michigan Disposal Waste Treatment Plant (@PA I.D.# MID00072831)

Wayne Disposal, Inc. (EPA LD. # MIDGAW 2012)

49350 N. I-94 Service Drive Belleville, Michigan 48111

PHONE NUMBER:

1-800-592-5489

FAX NUMBER:

1-800-593-5329

Authorized Signature:_

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

ATTACHMENT "B"

Certificate

This is to certify that

Anthony Thomas Big River Zinc Corporation has successfully completed

Hazardous Waste Management: The Complete Course

in accordance with 40 CFR 265.16

presented by

ENVIRONMENTAL RESOURCE CENTER

101 Center Pointe Drive, Cary, NC 27513 919-469-1585 www.ercweb.com

Lara Pilon, Instructor

June 12-13, 2007

Date

Certificate Number: 47226

Certificate

This is to certify that

Mike Altepeter Big River Zinc Corporation has successfully completed

Hazardous Waste Management: The Complete Course

in accordance with 40 CFR 265.16

presented by

ENVIRONMENTAL RESOURCE CENTER

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

www.ercweb.com

Lara Pilon, Instructor

June 12-13, 2007

Date Certificate Number: 47225

retificate of Achieven This certificate has been awarded to:

Thomas Gallagher

Saint Louis, Missouri

Hazardous Materials Transportation Certification Workshop on regulations of the United States Department of Transportation, regarding the safe and legal transportation of materials designated as hazardous and for attaining a For successfully completing the Lion Technology Inc. two-day passing grade on the final proficiency test. This training is designed to satisfy the General Awareness, Function-Specific, and Security Awareness training requirements of 49 CFR 172.704(a) for typical managers and supervisors of hazardous materials transportation functions. Training was conducted by Lion Technology Inc., Lafayette, NJ 07848 (973-383-0800).

This training completed on: **16 November 200**7

1.3 CEUs, 1.0 CHMM CM Points, 2.0 ABIH CM Points, 13 NEHA CE Contact Hours Awarded National Registry of Professionals - Member PIN: 701-6666





extificate of Achievenen

This certificate has been awarded to:

Courtney Blind

z

St. Louis, Missouri

Hazardous Materials Transportation Certification Workshop on regulations of the United States Department of Transportation, regarding the safe and legal transportation of materials designated as hazardous and for attaining a For successfully completing the Lion Technology Inc. two-day passing grade on the final proficiency test.

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This training completed on: 16 November 2007

National Registry of Professionals - Member PIN: 701-7854 1.3 CEUs, 1.0 CHMM CM Points, 2.0 ABIH CM Points, 13 NEHA CE Contact Hours Awarded

Mare Cleaning

NSTRUCTOR



ATTACHMENT "C"

Big River Zinc Corporation 2401 Mississippi Ave. Sauget, IL 62201

Invoice Number: 2008-1

1/30/08

Vendor:

Staab Battery Mfg. 931 S. 11th Street

Springfield, Il 62703

Remit To: Big River Zinc Corp. 2401 Mississippi Ave.

Sauget, II 62201

Description

Qty. UOM

Unit Cost

Extended amount

Used Batteries

72 each

\$4.00 ea

\$288.00

Pick-up and delivery hours 7 a.m. till 3 p.m. Monday thru Friday

Invoice Total due: \$288.00

paid in Cash or pickup

193610 DATE 1936 DATE		Report Months Amount	AMOUNT JUNK TOTAL	AME PROPERLY CLASSIPED, DESCHAED, PACKAGED SON TRANSPORTATION ACCORDING TO MPLICABLE
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P.O. NO.

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BIG RIVER ZINC CORPORATION

2401 Mississippi Avenue Sauget, IL 62201

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Lens Mairers RECYCLING BILL OF LADING www.hir-group.com

5856



HTR-GROUP

P.O. Box 185 Lake Ozark, MO 65049 Phone: 573-382-7575 Fax: 573-382-7579

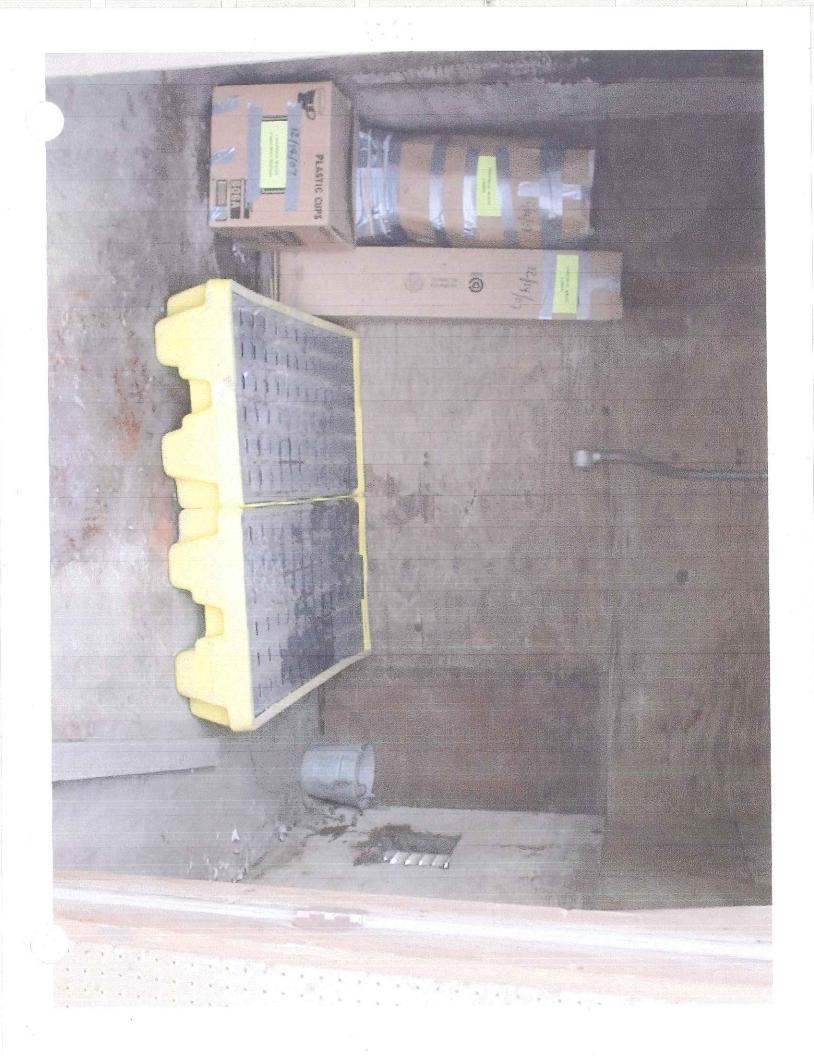
Bill of Lading No: Fed. I.D. #43-1741927 US EPA #MORDO504458 US OOT #690697

77 Resource Recovery #RR0500 04456 MO Gen #036936 US DOT HAZMAT#012203 700 002K

Email: sales@hir-group.cam	MC Ray Waste Ingre, PM-2243 ISUA PRIORWOODGUT73
GENERATOR OF WASTE,	DESCRIPTION OF WASTE:
ANDRESS 2401 MISSISSIPPI ME	✓ LINIVERSAL WASTE
CITY STATE ZIP STOCK PT 26 63-20	HAZARDOUS WASTE
CONTACT Sve	
PHONE # 6'8 - 274-6278	
P.O. 8	

The metarial as marked under "DESCRIPTION OF WASTE" was properly decisied and propered for transportation and lander in accordance with all explicable sequence, ordinances, permits, rules and regulations of the Pecons. State and local governments in whose jurisdiction such metarials originalise, passes through or is tendered for delivery, I certify (or decium) under panelty of perjury that the forgoing is true and correct. HTR-GROW upon adoptance and recyte of the above described waste with have rendered a service and upon submission of an invoice charges will be due in accordance with centract or in lieu of contract, prevailing current rates in effect at time of service.

Signature of generator au	thorized agent	•	Tille		Date		
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TREATMENT FACIL	ITY:						
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The transporter above de		rests to this leasily an	d it was acceptab				
TREATMENT METH I certily (or declare) unde				DISPOSAL DAT	E: <u>Lamps v</u>	VITHIN 12 DAYS OF	DELIVERY
Signature of HTR Receiv	ing Technician	Title		Date			
١	White - Generator	Censry - Office	Pink - Account	dan Blus - Cu	stomer Gre	en - Trackton	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 5** 77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JAN 17 2008

LR-8J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Michael Altepeter Environmental Manager Big River Zinc Corporation 2401 Mississippi Avenue Sauget, IL 62201

Re:

Notice of Violation

Big River Zinc Corporation EPA Id No.: ILD062444435

Dear Mr. Altepeter:

On September 19, 2007, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the Big River Zinc Corporation (BRZ) located in Sauget, Illinois. The purpose of the inspection was to evaluate BRZ's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by BRZ personnel, review of records, and physical observations made by the inspector at the time of the investigation, U.S. EPA has determined that BRZ is engaged in storage of hazardous waste without a permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage permit, BRZ must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)]. We find that BRZ was in noncompliance with the following conditions for a hazardous waste storage permit exemption, and in violation of the following requirements:

In order to avoid the need for a hazardous waste storage permit, a large quantity generator 1. of hazardous waste accumulating hazardous waste on-site, must store the waste in containers, tanks, drip pads or containment building. See, 35 IAC § 722.134(a)(1) [40 CFR § 262.34(a)(1)].

At the time of the inspection, BRZ was storing hazardous waste concrete and wood generated from its demolition activities in two open piles located on northeast portion of the plant. The hazardous waste concrete was being stored in a pile on the former concentrate storage pad, and the hazardous waste wood was being stored in a pile located just to the west of the former concentrate storage building. BRZ, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption.

- 2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must include the following information, among other things, in its hazardous waste contingency plan:
 - The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 35 IAC § 725.137.
 - The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. [emphasis added]
 - The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems [internal and external], and decontamination equipment) where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list and a brief outline of its capabilities. [emphasis added]

See, 35 IAC §§ 722.134(a)(4) and 725.152 [40 CFR §§ 262.34(a)(4) and 265.52]. These are also requirements of owners and operators of hazardous waste storage facilities under 35 IAC §§ 724.152 and 725.152 [40 CFR §§ 264.52 and 265.52].

At the time of the U.S. EPA inspection, BRZ's hazardous waste contingency plan did not describe arrangements agreed to by the local police department, fire department, hospitals, contractors and State and local emergency response teams pursuant to 35 IAC § 725.137. The contingency plan also did not list the addresses of the persons designated as emergency coordinators. In addition, the contingency plan did not provide a brief outline of the capabilities of each piece of emergency equipment.

Therefore, BRZ failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility contingency plan requirements.

- 3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must maintain the following document with respect to its training program for employees with duties involving hazardous waste management:
 - A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position related to hazardous waste management.

See, 35 IAC §§ 722.134(a)(4) and 725.116(d)(3) [40 CFR §§ 262.34(a)(4) and 265.16(d)(3)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC §§ 724.116(d)(3) and 725.116(d)(3) [40 CFR §§ 264.16(d)(3) and 265.16(d)(3)].

At the time of the inspection, BRZ did not have the above-mentioned document. BRZ, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit, and violated the hazardous waste storage facility training requirement.

4. A large quantity generator who accumulates hazardous waste on-site and who does not meet the conditions for a permit exemption of 35 IAC § 722.134(a) [40 CFR § 262.34(a)] is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC §§ 703.121(a) and (b); 703.180(c); 705.121(a).

Upon failing to comply with the conditions for a hazardous waste permit exemption specified in items 1 through 3, above, BRZ's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC §§ 703.121(a) and (b); 703.180(c); and 705.121(a).

At this time, U.S. EPA is not requiring BRZ to apply for and obtain a hazardous waste storage permit so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

It should also be noted that at the time of U.S. EPA's inspection, BRZ was storing universal waste lamps and batteries in a small shed located next to a fueling station. Many of the lamps were not being stored in containers or packages, or were in containers or packages that were not large enough to completely contain the lamp (i.e., one end of the lamp was protruding from the container). Regarding the lamps that were in containers, the containers were not labeled with the words, "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps." Finally, the waste batteries were not labeled with the words, "Universal Waste-Batteries," "Waste Batteries," or "Used Batteries."

Please be informed that the Standards for Small Quantity Handlers of Universal Waste in Illinois require a small quantity handler of universal waste lamps to contain all lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. In addition, each container or package of universal waste lamps must be labeled or clearly marked with one of the following phrases: "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps." Finally, universal waste batteries (i.e., each battery) or a container in which the batteries are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste-Batteries," "Waste Batteries," or "Used Batteries."

You should submit your response to Todd Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,

Willie H. Harris, P.E.

Chief

RCRA Branch

Land and Chemicals Division

Enclosure

ce: Todd Marvel, Illinois Environmental Protection Agency

Land and Chemicals Division

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☐ Termination of Order		¥
Type of Document: Notice of Violation and	Inspection Report/Checklist	
□ No Violation Letter and	Inspection Report/Checklist	
□ Letter of Acknowledgme	ent	
□ Information Request		
□ Pre-Filing Notice and Op	• •	
□ State Notification of Ent	forcement Action	
□ Other Correspondence		
Facility Name: Big River Zinc Corporation		
Facility Location: 2401 Mississippi Avenue	_ \$ of a r _ r _ r _ r	
City: Sauget	State: Illinois	
U.S. EPA ID#: ILD062444435		10
Assigned Staff: Todd Brown	Phone: (312)886-6091	
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Name	Signature	Date
Author	told brown	1/2/08
CS1 Section Chief Initial Review	Lower M. Jenson	1/3/08
Regional Counsel	Step 2	1/14/08 11/00-
CS1 Section Chief Final Review	Mesur	1/14/08
LCD Branch Chief	Allo Alans	1/15/08

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

- 1. Date stamp the cover letter;
- 2. Make four copies of the contents of this folder:

One copy for the assigned staff;

One copy for the section file;

One copy for the branch file; and

One copy for the official file copy.

- 3. Make any additional copies for cc=s or bcc=s.
- 4. Mail the original certified mail and distribute office copies and cc=s and bcc=s.

Once the certified mail receipt is returned:

- 5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
- 6. E-mail staff the date that the letter was received by facility.